instead of the combustion chamber of the TDU (Reconfigured TDU). After reconfiguration, fuel for the TDU is limited to natural gas and propane.

9. The Respondents shall operate the Reconfigured TDU during the shakedown period in accordance with the operating parameters limits set forth in Appendix 1, Table B when the dryer feed is on. The Respondent shall not operate the Reconfigured TDU more than 720 hours (including the shakedown period and the Compliance Demonstration Test). The Respondents shall keep records of the hours of operation during the shakedown period. The Respondents shall operate a continuous emissions monitor system (CEMS) for carbon monoxide (CO) for the TOU during the shakedown period. The Respondents shall operate the Reconfigured TOU in a manner that the hourly rolling averages for CO are not exceeded. The rolling averages shall be calculated in accordance with 40 C.F.R. §§ 63.1209(a)(6) and 63.1209(b)(5).

10. During the shakedown period, the Respondents shall monitor and operate an automatic hazardous waste feed cutoff (AWFCO) at the Reconfigured TDU in accordance with 40 C.F.R. § 63.1206(c)(ii) and (iv) that immediately and automatically cuts off the hazardous waste feed when any component of the AWFCO system fails, or when one or more of the operating parameter limits set forth in Appendix 1, Table B that are designated as AWFCO parameters are not met. The Respondents shall also comply with the investigation, recordkeeping, testing, and reporting requirements of 40 C.F.R. § 63.1206(c)(3) (v), (vi) and (vii).

11. The Respondents shall conduct a test measuring the concentration of CO in the exhaust gases from the TOU. This test shall include three one-hour runs during which the TDU is operated on oil-bearing hazardous waste. The emissions from the TOU stack shall be monitored for carbon monoxide and oxygen using EPA Method 10. The emissions shall be

demonstrated to be less than 100 ppmV CO corrected to 7% O_2 in each run. The test frequency shall be once during each six-month period, January 1 – June 30 and July 1 - December 31, said time period to commence after conducting the CDT and continuing until the TCEQ issues a RCRA Subpart X permit for the Reconfigured TDU. Within forty-five (45) days after conducting the test, the Respondents shall submit a test report to EPA summarizing the test results. The time periods for conducting the test may be changed to once during each twelve (12) month calendar period, January 1 - December 31, if the Respondents submit to EPA, with a copy to TCEQ, a detailed feed stream analysis plan that characterizes the waste received by the facility, and EPA approves the plan. The detailed feedstream analysis plan shall be prepared in accordance with 40 C.F.R. § 264.13 and the EPA Guidance Document "Waste Analysis At Facilities That Generate, Treat, Store, And Dispose of Hazardous Waste", OSWER 9938.4-03 (April 1994). The Respondents will implement the detailed feedstream analysis plan, as approved or modified by EPA, immediately upon receipt of EPA's approval.

12. The Respondents shall prepare a report for the time period beginning on the effective date of this CAFO and ending June 30, 2013, and every six (6) months thereafter. The report shall be submitted to EPA, with a copy to TCEQ, within thirty (30) days of the end of the reporting period. The report shall include the following:

a. For each waste stream accepted by the oil reclamation unit, identify the customer, original generator, waste stream description, RCRA waste codes, the SIC or NAICS code of the process generating the waste, a summary of any analyses conducted by the Respondents to verify the waste stream profiles, and the total volume of waste accepted during the reporting period. If requested by EPA, the Respondents shall provide copies of relevant waste approval documents and manifests for the specific waste streams.

b. All time periods in which there were exceedances of the operating parameters and the AWFCO requirements set forth in Appendix 1, Tables A and B, and exceedances of the hourly rolling averages for CO (Paragraph 69.A.9).

c. All exceedances of the Reconfigured TDU Compliance Standards and the AWFCO requirements established in accordance with Paragraph 69.C.9.

d. The initial Report shall include documentation showing that the tune-up and fuel specification analysis required by Paragraphs 69.A.5 and 69.A.6 have been conducted, and provide documentation showing the date of installation and subsequent operation of the AWFCO system required by Paragraphs 69.A.7.

e. Documentation showing the installation of the TOU required by Paragraph 69.A.8, and the additional AWFCO requirements required by Appendix 1, Table B (Paragraph 69.A.10).

The Report may be submitted in an electronic format (i.e., compact disk). The Respondents may claim the report as confidential business information (CBI), in accordance with the requirements of 40 C.F.R. Part 2. However, information that is emissions data or a standard or limitation cannot be claimed as CBI. 40 C.F.R. § 2.301(e). If the Report contains any information that is claimed CBI, the Respondents shall provide a redacted version with all CBI deleted.

B. RCRA Permit Modification

1. Within one year of the effective date of this CAFO, the Respondents shall submit to TCEQ, with a copy to EPA, an application for a Class 3 RCRA Permit Modification to permit the Reconfigured TDU as a miscellaneous unit under 40 C.F.R. Part 264, Subpart X in accordance with 30 T.A.C. § 335.152(a)(16) [40 C.F.R. Part 264, Subpart X], 30 T.A.C. Chapter 305 [40 C.F.R. §§ 270.10 – 270.14, 270.19, 270.23, and 270.30 – 270.33].

2. The permit application shall also include relevant requirements of 40 C.F.R. Part 264, Subparts I through O and AA through CC, 40 C.F.R. Part 270, and 40 C.F.R. Part 63, Subpart EEE that are appropriate for the operation of the Reconfigured TDU, including an engineering report, waste analysis, monitoring and inspection requirements, and closure requirements set forth in 30 T.A.C. § 335.152(a)(13) [40 C.F.R. §§ 264.341, 264.347, and 264.351].

3. The Respondents shall also request that the issued RCRA permit modification include the following:

a. The feedstock limitations applicable to the operation of the oil reclamation unit under 40 C.F.R. § 261.6(a)(3)(iv)(C) set forth in Paragraph 69.D;

b. The investigation, recordkeeping, testing, and reporting requirements of 40 C.F.R. § 63.1206(c)(3) (v), (vi) and (vii);

c. Appropriate recordkeeping and reporting requirements; and

d. Any applicable risk-based terms and conditions necessary to protect human health and the environment.

4. The failure to timely submit a Class 3 Permit Modification to TCEQ and EPA within the deadline set forth in Paragraph 69.B.1 shall result in the termination of the Respondents' authorization to operate the Reconfigured TDU on that date unless that deadline has been extended pursuant to Section IV.F (Force Majeure).

5. By no later than three and one-half years (42 months) from the effective date of this CAFO, the Respondents must complete all permitting requirements and obtain issuance from the TCEQ of a final RCRA Subpart X permit for the TDU as a Subpart X – Miscellaneous Unit in accordance with 30 T.A.C. § 335.152(a)(16) [40 C.F.R. Part 264, Subpart X], 30 T.A.C. Chapter 305 [40 C.F.R. §§ 270.10 – 270.14, 270.19, 270.23, and 270.30 – 270.33], and which

incorporates the appropriate requirements of 40 C.F.R. Part 264, Subparts I through O and AA through CC, 40 C.F.R. Part 270, and 40 C.F.R Part 63, Subpart EEE. In the event that TCEQ does not issue a RCRA Subpart X permit for the Reconfigured TDU as described above by the above deadline, the Respondents' authorization to operate the Reconfigured TDU terminates on that date, unless that deadline has been extended pursuant to Section IV.F (Force Majeure).

C. Compliance Demonstration Test

1. The Respondents shall perform a compliance demonstration test (CDT) in accordance with the approved CDT Plan, which is attached as Appendix C and incorporated by reference into the CAFO. The CDT requires the Respondents to demonstrate compliance with the emissions limits of 40 C.F.R. § 63.1219(b) set forth in Paragraph C.5, the destruction and removal efficiency standard of 40 C.F.R. § 63.1219(c)(1) set forth in Paragraph C.4, and establish limits for the operating parameters set forth in Paragraph 69.C.6 (Appendix 1, Table C).

2. Within sixty (60) days of the effective date of this CAFO, the Respondents shall submit to EPA for approval, with a copy to TCEQ, a Quality Assurance Project Plan (QAPP) for the CDT. The QAPP shall be prepared in accordance with the EPA Region 6 Guidance "Quick Reference Guide, Test Burn Program Planning for Hazardous Waste Combustion (HWC) Units" dated August 6, 2012. The Respondents shall implement the QAPP as approved or modified by EPA.

3. The Respondents shall implement the CDT in accordance with Appendix 3 within ninety (90) days after reconfiguration of the TDU pursuant to Paragraph 69.A.8 of this CAFO.

4. During the CDT, the Respondents must achieve a destruction and removal efficiency (DRE) of 99.99% for toluene, the designated principle organic hazardous constituent (POHC). The DRE shall be calculated in accordance with 40 C.F.R. § 63.1219(c)(1).

5. The emission limits that must be met during the CDT are set forth in 40 C.F.R. § 63.1219(b).

6. The operating parameters limits that will be established during the CDT are set forth in Appendix 1, Table C.

7. The Respondents must not exceed the emission limits set forth in 40 C.F.R. § 63.1219(b), and must achieve a DRE of 99.99% for toluene [as set forth in 40 C.F.R. § 63.1219(c)] for all three runs in order to have a successful CDT. If the Respondents determine, based on the results of analyses of stack samples, that they have exceeded any emission standard or failed to meet the DRE requirement during any of the three runs, they must immediately cease processing hazardous waste in the Reconfigured TDU. The Respondents must make this determination within forty-five (45) days following completion of the CDT. The Respondents may not resume operation of the Reconfigured TDU until the Respondents have submitted and received EPA approval of a revised CDT plan, at which time operations can resume to demonstrate compliance with the emission limits and DRE requirements during all of the three runs.

8. All analyses required by the CDT plan shall be performed by a NELAC accredited laboratory or by a laboratory pre-approved by TCEQ.

9. Within ninety (90) days from completion of the CDT, the Respondents shall submit a CDT Report to EPA and TCEQ prepared in accordance with requirements in the CDT Plan, documenting compliance with the DRE standard and emission limits set forth in Paragraphs 69.C.4 and 69.C.5, and identifying operating parameter limits and AWFCO settings for the parameters set forth in Appendix 1, Table C. The DRE standard, emission limits, operating parameter limits, and the AWFCO settings shall also be set forth in a separate Appendix entitled

"Reconfigured TDU Compliance Standards". All data collected during the CDT (including, but not limited to, field logs, chain-of-custody documentation, monitoring data, sampling and analytical results, and any other data or calculations supporting the emissions calculations or operating parameter limits) must be submitted to EPA and TCEQ as part of the CDT Report. However, information in the CDT Report that is emissions data or a standard or limitation cannot be claimed as CBI. 40 C.F.R. § 2.301(e). If the Report contains any information that is claimed CBI, the Respondents shall provide a redacted version with all CBI deleted.

10. As of the date of the submission of the CDT Report, the Respondent shall comply with all operating requirements set forth in the "Reconfigured TDU Compliance Standards", unless otherwise notified by EPA.

11. EPA will review the CDT Report. EPA will make a finding concerning compliance with the emissions standards, DRE requirements, and other requirements of the CDT. If EPA determines that the Respondents have met all the requirements, it shall issue a Finding of Compliance to the Respondents. If EPA determines that the Respondents did not meet all of the requirements, it shall issue a Finding of Non-Compliance. Subject to Paragraph 69.C.7 of this CAFO, the issuance of a Finding of Non-Compliance by EPA shall result in the termination of the Respondents' authorization to operate the Reconfigured TDU on that date.

12. The failure to timely submit a CDT Report to EPA and TCEQ within ninety (90) days from completion of the CDT shall result in the termination of the Respondents' authorization to operate the Reconfigured TDU on that date, unless that deadline has been extended pursuant to Section IV.F (Force Majeure).

D. Compliance with 40 C.F.R. § 261.6(a)(3)(iv)(C)

1. Unless the TDU and the tanks identified in Paragraph 20 are authorized by the RCRA Permit Modification required by Section III.B of this CAFO (or any subsequent permit amendment) to receive wastes that do not meet the requirements set forth in 40 C.F.R. § 261.6(a)(3)(iv)(C), feedstock for the oil reclamation unit shall consist only of non-hazardous waste, and oil-bearing hazardous waste from petroleum refining, production, and transportation practices. Oil-bearing hazardous waste from petroleum refining, production, or transportation practices includes the following listed hazardous waste from specific Petroleum Refining Sources (K049, K050, K051, K052, K169, and K170). Also acceptable is oil-bearing hazardous waste from processes which meet the definition of the following Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes (i.e., petroleum refining, production, and transportation practices) as follows:

SIC Code	SIC Description	NAICS Code	NAICS Title
1311	Crude Petroleum & Natural Gas	211111	Crude Petroleum and Natural Gas Extraction
1321	Natural Gas Liquids	211112	Natural Gas Liquid Extraction
1381	Drilling Oil & Gas Wells	213111	Drilling Oil and Gas Wells
1382	Oil & Gas Field Exploration Services (except geophysical mapping & surveying)	213112	Support Activities for Oil & Gas Operations
1389	Oil and Gas Field Services, NEC (except construction of field gathering lines, site preparation and related construction activities performed on a contract or fee basis)	213112	Support Activities for Oil and Gas Operations
2911	Petroleum Refining	324110	Petroleum Refineries
4612	Crude Petroleum Pipelines	486110	Pipeline Transportation of Crude Oil
4613	Refined Petroleum Pipelines	486910	Pipeline Transportation of Refined Petroleum Products

4789	Transportation Services, NEC (pipeline terminals and stockyards for transportation)	488999	All Other Support Activities for Transportation
4922	Natural Gas Transmission	486210	Pipeline Transportation of Natural Gas
4923	Natural Gas Transmission and Distribution (distribution)	221210	Natural Gas Distribution
4923	Natural Gas Transmission and Distribution (transmission)	486210	Pipeline Transportation of Natural Gas
5171	Petroleum Bulk Stations and Terminals (except petroleum sold via retail method)	488999	All Other Support Activities for Transportation
5172	Petroleum and Petroleum Products Wholesalers, Except Bulk Stations and Terminals (merchant wholesalers)	424720	Petroleum and Petroleum Products Merchant Wholesalers (except Bulk Stations and Terminals)

Nothing in this Section III.D shall be construed to preclude Respondents from seeking authorization from the TCEQ to process oil-bearing materials outside the scope of 40 C.F.R. § 261.6(a)(3)(iv)(C). However, the definition of oil-bearing hazardous waste from petroleum refining, production, or transportation practices set forth in this Paragraph shall remain the same.

2. Using feedstock from processes meeting the definition of the aforementioned SIC/NAICS Codes does not constitute compliance with 40 C.F.R. § 261.6(a)(3)(iv)(C) or this CAFO. The Respondents are required to make a separate determination whether the hazardous waste in question is "oil-bearing," and that the hazardous waste was originally generated from petroleum refining, production, or transportation practices. The Respondents shall request that this provision be placed in the issued RCRA permit as applicable to the oil reclamation unit operation under 40 C.F.R. § 261.6(a)(3)(iv)(C).

E. TCEQ Submission, Revision, and Approval Process

1. For the Class 3 RCRA Permit Modification required be submitted to TCEQ for approval under this CAFO, TCEQ will review the application in accordance with 30 T.A.C.

§§ 281.3(c), 281.18 and 281.19(a) and (b). The Respondents must respond to any Notice of Deficiency (NOD), with a copy to EPA, within the time period specified by the TCEQ. In the event that the Respondents fail to submit a timely and complete NOD response, the Respondents' authorization to operate the TDU shall terminate on the NOD response deadline unless that deadline has been extended pursuant to Section IV.F (Force Majeure).

F. Additional Conditions

1. To comply with this CAFO, the Respondents must obtain a RCRA permit for the TDU as a Subpart X – Miscellaneous Unit in accordance with 30 T.A.C. § 335.152(a)(16) [40 C.F.R. Part 264, Subpart X], 30 T.A.C. Chapter 305 [40 C.F.R. §§ 270.10 – 270.14, 270.19, 270.23, and 270.30 – 270.33], and which incorporates the appropriate requirements of 40 C.F.R. Part 264, Subparts I through O and AA through CC, and 40 C.F.R. Part 270, and 40 C.F.R Part 63, Subpart EEE.

2. The Respondents may seek relief under the provisions of Section IV.F of this CAFO (Force Majeure) for any delay in the performance of any such obligations resulting from a failure to obtain, or a delay in obtaining, any permit or approval required to fulfill such obligation, if the Respondent has submitted a timely and complete application and has taken all other actions necessary to obtain such permit or approval.

G. EPA Review and Comment on RCRA Permit

1. Nothing in this CAFO shall limit EPA's rights under applicable environmental laws or regulations, including, but not limited to, Section 3005(c)(3) of RCRA, 42 U.S.C. § 6925(c)(3), 40 C.F.R. § 270.32 and 40 C.F.R. § 271.19, to review, comment, and incorporate appropriate requirements of 40 C.F.R. Parts 264, Subparts I through O and Subparts AA through CC, and

40 C.F.R. Part 63, Subpart EEE directly into the permit or establish other permit conditions that are based on those parts; or take action under Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), against the Respondents on the ground that the RCRA permit for the Reconfigured TDU does not comply with a condition that the EPA Region 6 Regional Administrator in commenting on the permit application or draft permit stated was necessary to implement approved State program requirements, whether or not that condition was included in the issued permit. If the Respondent disputes an action taken by EPA pursuant to 40 C.F.R. § 270.32 or 40 C.F.R. § 271.19, the Defendant may invoke Dispute Resolution in accordance with Section IV.E of this CAFO.

H. Submissions

In all instances in which this Compliance Order requires written submissions to EPA and TCEQ, each submission must be accompanied by the following certification:

> "I certify under penalty of law to the best of my knowledge and belief, that the information contained in or accompanying this submission is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

All submissions must be certified on behalf of the Respondent(s) by the signature of a person authorized to sign a permit application or a report under 40 C.F.R. § 270.11.

I. Monitoring, Recordkeeping, and Record Retention Requirements

1. Upon the effective date of this CAFO, all interim operating parameters (Appendix 1, Table A), shakedown operating parameters (Appendix 1, Table B), and final operating parameters limits (Appendix 1, Table C and Paragraph 69.C.6) subject to AWFCO limits shall be monitored by the facility's Continuous Process Monitoring System (CPMS), which records data once per minute in an electronic data log (DLG). In addition, the Respondents shall keep copies

of all documents relating to compliance with the operating parameters limits not monitored by the CPMS, and all other documents relating to compliance with Section III of this CAFO. All records, including electronic records, shall be kept for a period of one year after termination of the CAFO. These monitoring and recordkeeping requirements are in addition to any other monitoring and/or recordkeeping requirements required by federal, state, or local laws, regulations, or permits. This information shall be made available to EPA and TCEQ upon request.

2. In addition, the Respondents shall preserve, for a period of one year after termination of the CAFO, all records and documents in its possession or in the possession of its divisions, employees, agents, contractors, or successors which in any way relate to this CAFO regardless of any document retention policy to the contrary. This information shall be made available to EPA and TCEQ upon request.

J. EPA Approval of Submissions

EPA will review the plans set forth in Paragraphs 69.A.11 (if applicable) and 69.C.2, and notify the Respondents in writing of EPA's approval or disapproval of the plan or any part thereof. Within the time specified, the Respondents shall address the deficiencies and submit a revised plan. EPA will approve, disapprove, or modify the revised submittal. EPA approved plans shall be incorporated by reference into this CAFO.

IV. TERMS OF SETTLEMENT

A. CIVIL PENALTY

70. Pursuant to the authority granted in Section 3008 of RCRA, 42 U.S.C. § 6928, and upon consideration of the entire record herein, including the Findings of Fact and Conclusions of Law, which are hereby adopted and made a part hereof, and upon consideration of the

seriousness of the alleged violations, the Respondents' good faith efforts to comply with the applicable regulations, and the June 2003 RCRA Civil Penalty Policy, it is hereby **ORDERED** that the Respondent U.S. Ecology Texas, Inc. be assessed a civil penalty of **ONE HUNDRED SIXTY-FIVE THOUSAND, SIX HUNDRED FIFTY-SEVEN DOLLARS ($165,657)**, and the Respondent TD*X Associates L.P. be assessed a civil penalty of **SIX HUNDRED TWENTY-TWO THOUSAND, FOUR HUNDRED SIXTY-THREE DOLLARS ($622,463).** The Respondent USET shall pay the assessed civil penalty within thirty (30) days of the effective date of this CAFO. The Respondent TD*X Associates L.P. shall pay the assessed civil penalty in four (4) payments as follows:

Payment No. 1: $157,978.35 within thirty (30) days of the effective date of this CAFO.

Payment No. 2: $157,978.35 ($153,268.99 civil penalty plus interest of $4,709.36) within one year of the effective date of this CAFO.

Payment No. 3: $157,978.35 ($154,822.97 civil penalty plus interest of $3,155.38) within two years of the effective date of this CAFO.

Payment No. 4: $157,978.34 ($156,392.69 civil penalty plus interest of $1,585.65) within three years of the effective date of this CAFO.

71. The Respondents shall pay the assessed civil penalty by certified check, cashier's check, or wire transfer, made payable to "Treasurer, United States of America, EPA - Region 6". Payment shall be remitted in one of three (3) ways: regular U.S. Postal mail (including certified mail), overnight mail, or wire transfer. For regular U.S. Postal mail, U.S. Postal Service certified mail, or U.S. Postal Service express mail, the check(s) should be remitted to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

For overnight mail (non-U.S. Postal Service, e.g. Fed Ex), the check(s) should be remitted to:

U.S. Bank
Government Lockbox 979077
US EPA Fines & Penalties
1005 Convention Plaza
SL-MO-C2-GL
St. Louis, MO 63101
Phone No. (314) 418-1028

For wire transfer, the payment should be remitted to:

Federal Reserve Bank of New York
ABA: 021030004
Account No. 68010727
SWIFT address = FRNYUS33
33 Liberty Street
New York, NY 10045
Field Tag 4200 of the Fedwire message should read
"D 68010727 Environmental Protection Agency"

PLEASE NOTE: Docket numbers RCRA-06-2012-0936 (Respondent USET) and RCRA-06-2012-0937 (Respondent TD*X) shall be clearly typed on the respective checks to ensure proper credit. If payment is made by check, the check shall also be accompanied by a transmittal letter and shall reference the Respondent's name and address, the case name, and docket number of the CAFO. If payment is made by wire transfer, the wire transfer instructions shall reference the Respondent's name and address, the case name, and docket number of the CAFO. The Respondents shall also send a simultaneous notice of such payment, including a copy of the check and transmittal letter, or wire transfer instructions to the following:

Chief, Compliance Enforcement Section (6EN-HE)
Hazardous Waste Enforcement Branch
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Lorena Vaughn
Regional Hearing Clerk (6RC-D)
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

The Respondents' adherence to this request will ensure proper credit is given when penalties are received in the Region.

72. The Respondents agree not to claim or attempt to claim a federal income tax deduction or credit covering all or any part of the civil penalty paid to the United States Treasurer.

73. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, unless otherwise prohibited by law, EPA will assess interest and late payment penalties on outstanding debts owed to the United States and a charge to cover the costs of processing and handling a delinquent claim. Interest on the civil penalty assessed in this CAFO will begin to accrue thirty (30) days after the effective date of the CAFO and will be recovered by EPA on any amount of the civil penalty that is not paid by the respective due date. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R. § 13.11(a). Moreover, the costs of the Agency's administrative handling of overdue debts will be charged and assessed monthly throughout the period the debt is overdue. *See* 40 C.F.R. § 13.11(b).

74. EPA will also assess a $15.00 administrative handling charge for administrative costs on unpaid penalties for the first thirty (30) day period after the payment is due and an additional $15.00 for each subsequent thirty (30) day period that the penalty remains unpaid. In addition, a

penalty charge of up to six percent per year will be assessed monthly on any portion of the debt which remains delinquent more than ninety (90) days. *See* 40 C.F.R. § 13.11(c). Should a penalty charge on the debt be required, it shall accrue from the first day payment is delinquent. *See* 31 C.F.R. § 901.9(d). Other penalties for failure to make a payment may also apply.

B. PARTIES BOUND

75. The provisions of this CAFO shall apply to and be binding upon the parties to this action, their officers, directors, agents, employees, successors, and assigns. The undersigned representative of each party to this CAFO certifies that he or she is fully authorized by the party whom he or she represents to enter into the terms and conditions of this CAFO and to execute and to legally bind that party to it.

C. ADDITIONAL REQUIREMENTS

76. The Respondents shall undertake the following additional requirements:

A. The Respondents agree that the oil reclamation unit and the TDU are subject to the requirements of 40 C.F.R. Part 61, Subpart FF.

B. Within thirty (30) days of the effective date of the CAFO, the Respondents shall submit to EPA a certification that the following equipment in the oil reclamation unit and the TDU is not in "volatile hazardous air pollutant" (VHAP) service, as that term is defined by 40 C.F.R. § 61.241:

1. pumps;
2. compressors;
3. pressure relief devices;
4. sampling connection systems;
5. open-ended valves or lines;

6. valves;

7. connectors;

8. surge control vessels;

9. bottoms receivers; and

10. control devices and systems.

This certification shall be submitted in accordance with Paragraphs 76.H and 76.I.

C. Pursuant to 40 C.F.R. § 61.354(c), as of the effective date of this CAFO, the Respondents shall install, calibrate, maintain, and operate according to manufacturer's specifications, devices to continuously monitor the control devices operations required by 40 C.F.R. § 61.349.

D. Pursuant to 40 C.F.R. § 61.345(a), within 180 days of the effective date of the CAFO, the Respondents shall install, operate, and maintain covers on Bins 1, 2, 3, 4, and the Centrifuge solid bins that meet the requirements of 40 C.F.R. § 61.345(a)(1). The cover and openings shall be in a closed, sealed position at all times that waste is in the container except when it is necessary to use the opening for waste loading, removal, inspection or sampling, as required by 40 C.F.R. § 61.345(a)(1)(ii). The Respondents shall monitor the cover and all openings for no detectable emissions initially and thereafter at least once per year by the methods specified in 40 C.F.R. § 61.355(h).

E. The Respondents shall use a submerged fill pipe when transferring waste into the containers by pumping, as required by 40 C.F.R. § 61.345(a)(2).

F. Within ninety (90) days after the reconfiguration of the TDU pursuant to Paragraph 69.A.8 of this CAFO, the Respondents shall conduct performance tests for the TOU and the carbon adsorption system to demonstrate compliance with the requirements of 40 C.F.R.

§ 61.349. The performance tests shall be conducted in accordance with the requirements of 40 C.F.R. § 61.355. A copy of the performance test results shall be submitted to EPA within ninety (90) days of completion of the performance tests. The performance tests results shall be submitted in accordance with Paragraphs 76.H and 76.I.

G. Within 210 days of the effective date of the CAFO, the Respondents shall submit a written report to EPA showing compliance with Paragraphs 76.C, 76.D, and 76.E.

H. The certification and report identified in this Section must be accompanied by the following certification:

> "I certify under penalty of law to the best of my knowledge and belief, that the information contained in or accompanying this submission is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

All submissions must be certified on behalf of the Respondent(s) by the signature of a person authorized to sign a permit application or a report under 40 C.F.R. § 270.11.

I. The certification and report required under this Section shall be sent to the following:

Craig Lutz
Toxics Enforcement Section (6EN-AT)
Compliance Assurance and Enforcement Division
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

D. STIPULATED PENALTIES

77. In addition to any other remedies or sanctions available to EPA, the Respondent(s) shall pay stipulated penalties in the following amounts for each day during which each failure or refusal to comply continues:

a. Failure to Timely Submit Reports or Plans - Paragraphs 69.A.11, 69.A.12, and 69.C.2

Period of Noncompliance	Penalty Per Violation Per Day
1st through 15th day	$ 1,000
16th through 30th day	$ 1,500
31st day and beyond	$ 2,500

b. Failure to Comply with Certain Interim Operating Requirements – Paragraphs 69.A.5, 69.A.6, 69.A.7 (installation of AWFCO only), 69A.8, and 69.A.11

Period of Noncompliance	Penalty Per Violation Per Day
1st through 15th day	$ 1,500
16th through 30th day	$ 2,500
31st day and beyond	$ 5,000

c. Failure to Comply with any Other Provision of Section III of this CAFO

Period of Noncompliance	Penalty Per Violation Per Day
1st through 15th day	$ 500
16th through 30th day	$ 1,000
31st day and beyond	$ 1,500

d. Failure to Comply with Additional Requirements – Section IV.C

Period of Noncompliance	Penalty Per Violation Per Day
1st through 15th day	$ 1,500
16th through 30th day	$ 2,500
31st day and beyond	$ 5,000

Penalties shall accrue from the date of the noncompliance until the date the violation is corrected, as determined by EPA.

78. The Respondent(s) shall pay stipulated penalties not more than fifteen (15) days after receipt of written demand by EPA for such penalties. Method of payment shall be in accordance with the provisions of Paragraph 71 herein. Interest and late charges shall be paid as stated in Paragraphs 73 - 74 herein.

79. Nothing in this agreement shall be construed as prohibiting, altering, or in any way limiting the ability of EPA to seek any other remedies or sanctions available by virtue of the Respondent(s) violation of this CAFO or of the statutes and regulations upon which this agreement is based, or for the Respondent's violation of any applicable provision of law.

E. DISPUTE RESOLUTION

80. If the Respondents object to any decision or directive of EPA in regard to Section III or IV.C, the Respondents shall notify each other and the following persons in writing of its objections, and the basis for those objections, within thirty (30) calendar days of receipt of EPA's decision or directive:

Associate Director
Hazardous Waste Enforcement Branch (6EN-H)
Compliance Assurance and Enforcement Division
U.S. EPA - Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

Chief, RCRA Enforcement Branch (6RC-ER)
Office of Regional Counsel
U.S. EPA - Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

81. The Associate Director of the Hazardous Waste Enforcement Branch or his/her designee (Associate Director), and the Respondents shall then have an additional thirty (30) calendar days from EPA's receipt of the Respondents' written objections to attempt to resolve the dispute. If an agreement is reached between the Associate Director and the Respondents, the agreement shall be reduced to writing and signed by the Associate Director and the Respondents and incorporated by reference into this CAFO.

82. If no agreement is reached between the Associate Director and the Respondents within that time period, the dispute shall be submitted to the Director of the Compliance

Assurance and Enforcement Division or his/her designee (Division Director). The Division Director and the Respondents shall then have a second 30-day period to resolve the dispute. If an agreement is reached between the Division Director and the Respondents, the resolution shall be reduced to writing and signed by the Division Director and the Respondents and incorporated by reference into this CAFO. If the Division Director and the Respondents are unable to reach agreement within this second 30-day period, the Division Director shall provide a written statement of EPA's decision to the Respondents, which shall be binding upon the Respondents and incorporated by reference into the CAFO.

83. If the Dispute Resolution process results in a modification of this CAFO, the modified CAFO must be approved by the Regional Judicial Officer and filed pursuant to Section IV.H (Modifications).

84. The invocation of dispute resolution procedures under this Section shall not extend, postpone, or affect in any way, any obligations of the Respondents under this CAFO, unless and until final resolution of the dispute so provides. Stipulated penalties with respect to the disputed matter shall continue to accrue from the first day of noncompliance, but payment shall be stayed pending resolution of the dispute. If the Respondents do not prevail on the disputed issue, stipulated penalties shall be assessed and paid as provided in Section IV.D.

F. FORCE MAJEURE

85. A "force majeure event" is any event beyond the control of the Respondents, their contractors, or any entity controlled by the Respondents that delays the performance of any obligation under this CAFO despite the Respondents' best efforts to fulfill the obligation. "Best efforts" includes anticipating any potential force majeure event and addressing the effects of any such event (a) as it is occurring and (b) after it has occurred, to prevent or minimize any resulting

delay to the greatest extent possible. "Force Majeure" does not include the Respondents' financial inability to perform any obligation under this CAFO, but does include any delays attributable to the TCEQ's permitting process and the conduct of the contested case hearing.

86. The Respondents shall provide notice orally or by electronic or facsimile transmission as soon as possible, but not later than 72 hours after the time the Respondents first knew of, or by the exercise of due diligence, reasonably should have known of, a claimed force majeure event. The Respondents shall also provide written notice, as provided in Section IV.G of this CAFO, within seven days of the time the Respondents first knew of, or by the exercise of due diligence, reasonably should have known of, the event. The notice shall state the anticipated duration of any delay; its cause(s); the Respondents' past and proposed actions to prevent or minimize any delay; a schedule for carrying out those actions; and the Respondents' rationale for attributing any delay to a force majeure event. Failure to give such notice shall preclude the Respondents from asserting any claim of force majeure.

87. The Respondent also shall provide notice orally or by electronic or facsimile transmission to the other Respondent not later than 24 hours after the time Respondent first knew of, or by the exercise of due diligence, reasonably should have known of, a claimed force majeure event, provided that the failure to give such notice shall not limit either Respondent's responsibilities under this CAFO.

88. If the Complainant agrees that a force majeure event has occurred, the Complainant may agree to extend the time for the Respondents to perform the affected requirements for the time necessary to complete those obligations. An extension of time to perform the obligations affected by a force majeure event shall not, by itself, extend the time to perform any other

obligation. Where the Complainant agrees to an extension of time, the appropriate modification shall be made pursuant to Section IV.H of this CAFO.

89. If the Complainant does not agree that a force majeure event has occurred, or does not agree to the extension of time sought by the Respondents, the Complainant's position shall be binding, unless the Respondents invokes Dispute Resolution under Section IV.D of this CAFO. In any such dispute, the Respondents bear the burden of proving, by a preponderance of the evidence, that each claimed force majeure event is a force majeure event; that the Respondents gave the notice required by the paragraph above, that the force majeure event caused any delay the Respondents' claimed was attributable to that event; and that the Respondents exercised their reasonable best efforts to prevent or minimize any delay caused by the event. If the Respondents carry this burden, the delay at issue shall be deemed not to be a violation of the affected obligation of this CAFO.

G. NOTIFICATION

90. Unless otherwise specified elsewhere in this CAFO, whenever notice is required to be given, whenever a report or other document is required to be forwarded by one party to another, or whenever a submission or demonstration is required to be made, it shall be directed to the individuals specified below at the addresses given (in addition to any action specified by law or regulation), unless these individuals or their successors give notice in writing to the other parties that another individual has been designated to receive the communication:

Complainant:

Chief, Compliance Enforcement Section (6EN-HE)
Hazardous Waste Enforcement Branch
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Respondent U.S. Ecology Texas, Inc.:

Mary Reagan
McGinnis, Lochridge & Kilgore, L.L.P.
600 Congress Avenue
Suite 2100
Austin, Texas 78701

Respondent TD*X Associates, L.P.:

J.D. Head
Fritz, Bryne, Head & Harrison, PLLC
98 San Jacinto Boulevard
Suite 2000
Austin, TX 78701

Texas Commission on Environmental Quality

Section Manager
Industrial and Hazardous Permits Section
Waste Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087 MC 130
Austin, TX 78711

H. MODIFICATION

91. The terms, conditions, and compliance requirements of this CAFO may not be modified or amended except as otherwise specified in this CAFO, or upon the written agreement of the Complainant and Respondent(s), and approved by the Regional Judicial Officer, and such modification or amendment being filed with the Regional Hearing Clerk.

I. RETENTION OF ENFORCEMENT RIGHTS

92. EPA does not waive any rights or remedies available to EPA for any other violations by the Respondents of Federal or State laws, regulations, or permitting conditions.

93. Except as herein provided, nothing in this CAFO shall limit the power and authority of EPA or the United States to take, direct, or order all actions to protect public health, welfare, or the environment, or prevent, abate or minimize an actual or threatened release of hazardous

substances, pollutants, contaminants, hazardous substances on, at or from the Respondent USET's facility or Respondent TD*X's oil reclamation unit and related equipment. Furthermore, nothing in this CAFO shall be construed or to prevent or limit EPA's civil and criminal authorities, or that of other Federal, State, or local agencies or departments to obtain penalties or injunctive relief under other Federal, State, or local laws or regulations.

94. The Complainant reserves all legal and equitable remedies available to enforce the provisions of this CAFO. This CAFO shall not be construed to limit the rights of the EPA or United States to obtain penalties or injunctive relief under RCRA or under other federal or state laws, regulations, or permit conditions.

95. In any subsequent administrative or judicial proceeding initiated by the Complainant or the United States for injunctive relief, civil penalties, or other appropriate relief relating to this Facility or the oil reclamation unit, the Respondents shall not assert, and may not maintain, any defense or claim based upon the principles of waiver, res judicata, collateral estoppel, issue preclusion, claim preclusion, claim-splitting, or other defenses based upon any contention that the claims raised by the Complainant or the United States in the subsequent proceeding were or should have been brought in the instant case, except with respect to claims that have been specifically resolved pursuant to this CAFO.

96. This CAFO is not a permit, or a modification of any permit, under any federal, State, or local laws or regulations. The Respondents are responsible for achieving and maintaining complete compliance with all applicable federal, State, and local laws, regulations, and permits. The Respondents' compliance with this CAFO shall be no defense to any action commenced pursuant to any such laws, regulations, or permits, except as set forth herein. The Complainant does not warrant or aver in any manner that the Respondents' compliance with any aspect of this

CAFO will result in compliance with provisions of the RCRA or with any other provisions of federal, State, or local laws, regulations, or permits.

J. INDEMNIFICATION OF EPA

97. Neither EPA nor the United States Government shall be liable for any injuries or damages to person or property resulting from the acts or omissions of the Respondents, their officers, directors, employees, agents, receivers, trustees, successors, assigns, or contractors in carrying out the activities required by this CAFO, nor shall EPA or the United States Government be held out as a party to any contract entered into by the Respondents in carrying out the activities required by this CAFO.

K. COSTS

98. Each party shall bear its own costs and attorney's fees. Furthermore, each Respondent specifically waives its right to seek reimbursement of its costs and attorney's fees under 5 U.S.C. § 504 and 40 C.F.R. Part 17.

L. TERMINATION

99. At such time as the Respondents believe they have completed all of the requirements of this CAFO, they may request that EPA concur whether all of the requirements of this CAFO have been satisfied. Such request shall be in writing and shall provide the necessary documentation to establish whether there has been full compliance with the terms and conditions of this CAFO. EPA will respond to said request in writing within ninety (90) days of receipt of the request. This CAFO shall terminate when all actions required to be taken by this CAFO have been completed, and the Respondents have been notified by the EPA in writing that this CAFO has been satisfied and terminated.

M. EFFECTIVE DATE

100. This CAFO, and any subsequent modifications, become effective upon filing with the Regional Hearing Clerk.

THE UNDERSIGNED PARTIES CONSENT TO THE ENTRY OF THIS CONSENT AGREEMENT AND FINAL ORDER:

FOR THE RESPONDENT:

Date: 9/27/12

US Ecology Texas, Inc.

FOR THE RESPONDENT:

Date: September 26, 2012

Carl R Palmer
TD*X Associates L.P.

FOR THE COMPLAINANT:

Date: 10·03·12

John Blevins
Director
Compliance Assurance and
Enforcement Division

FINAL ORDER

Pursuant to the Section 3008 of RCRA, 42 U.S.C. § 6928, and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, 40 C.F.R. Part 22, the foregoing Consent Agreement is hereby ratified. This Final Order shall not in any case affect the right or EPA or the United States to pursue appropriate injunctive relief or other equitable relief for criminal sanctions for any violations of law. This Final Order shall resolve only those causes of action alleged herein. Nothing in this Final Order shall be construed to waive, extinguish or otherwise affect the Respondents' (or their officers, agents, servants, employees, successors, or assigns) obligation to comply with all applicable federal, state, and local statutes and regulations, including the regulations that were the subject of this action. The Respondents are ordered to comply with the Compliance Order and terms of settlement as set forth in the Consent Agreement. Pursuant to 40 C.F.R. § 22.31(b), this Final Order shall become effective upon filing with the Regional Hearing Clerk.

Date: 10/4/12

Patrick Rankin
Regional Judicial Officer

APPENDIX 1 – OPERATING PARAMETERS

TABLE A

TDU OIL RECLAMATION SYSTEM INTERIM REQUIREMENTS PRIOR TO TOU INSTALLATION

Tag No.	Equipment Operating Parameter	Operating Parameter Limit	Compliance Basis
TT-18/19	TDU Dryer, Minimum Combustion Chamber Temperature	Maintain Temperature > 1,400°F	AWFCO: CPMS[1], 60-sec time delay
PT-1	TDU Dryer, Maximum Internal Pressure	Maintain Pressure < 0.00" W.C.	AWFCO: CPMS, 6-min Rolling Average (RA)[2]
OE-1	Purge Vent Gas Stream Maximum O_2 Concentration	O_2 < 7%	AWFCO: CPMS, 60-sec time delay
FE-101	Maximum Purge Vent Rate	Purge Vent Rate < 180 scfm	AWFCO: CPMS, Hourly Rolling Average (HRA)[3]
M-100	Minimum Percent Excess Air, Operation of Purge Vent Injector Air Supply	Purge Vent Air Supply > 20% Excess Air	AWFCO: CPMS, Tuning of Combustion Airflow
TE-28	Maximum Condenser System Exhaust Temperature	Temperature < 120°F	AWFCO: CPMS, HRA
	HEPA Filter Installed and Pressure Change Monitored to Ensure Integrity of Filter	Installed and Δ Pressure Monitoring	Installation Check; Δ Pressure Monitored Once Per Shift
	Maximum TDU Feed Mercury Concentration	[Hg] < 50 ppm/Bin	Blending Protocols & Documentation[4]
	Maximum TDU Feed Organic Halide Concentration	[Total Organic Halides] < 1,500 ppm/Bin	Blending Protocols & Documentation

[1] Continuous Process Monitoring System – See Paragraph 69.I of CAFO.

[2] Previous six 1-minute readings are summed and divided by six.

[3] 40 C.F.R. §§ 63.1209(b)(5).

[4] See Paragraph 69.A.3 of the CAFO.

TABLE B

TDU OIL RECLAMATION SYSTEM REQUIREMENTS AFTER TOU INSTALLATION PRE-COMPLIANCE DEMONSTRATION TEST OPERATIONS

Tag No.	Equipment Operating Parameter	Shakedown (Pre-Test) OPL	Compliance Basis
PT-1	TDU Dryer, Maximum Internal Pressure	Maintain Pressure < 0.00" W.C.	AWFCO: CPMS[5], 6-min RA[6]
M-05	TDU Dryer, Cylinder Rotation On	Motor Operating	AWFCO: CPMS, Instantaneous
M-18	Product Discharge System	Motor Operating	AWFCO: CPMS, Instantaneous
M-21	Recirculation Blower Operating	Motor Operating	AWFCO: CPMS, Instantaneous
TT-121	TOU, Minimum Combustion Chamber Temperature	Maintain Temperature > 1,400°F	AWFCO: CPMS, HRA[7]
KY-110	TOU, Minimum Residence Time (Calculated from Purge Vent Flow Rate, Exhaust T, and Air Ratio)	Residence Time > 0.5 seconds	AWFCO: CPMS, HRA
AE-5/ OE-5	TOU Exhaust Gas, Maximum CO Concentration	[CO] < 100 ppmV @ 7% O_2	AWFCO: CEMS for CO, HRA
OE-1	Purge Vent Gas Stream, Maximum O_2 Concentration	[O_2] < 7%	AWFCO: CPMS, Instantaneous
FE-101	Maximum Purge Vent Rate	Vent Flow < 250 scfm	AWFCO: CPMS, HRA
FCV-102	Valve Position to Ensure Purge Vent is not Directed Away from TOU	Valve Closed	AWFCO: CPMS, 60-sec delay
M-121	Minimum Percent Excess Air , Operation of Purge Vent Injector Air Supply	Purge Vent Air Supply > 20% Excess Air	AWFCO: CPMS, Tuning of Combustion Airflow
TE-28	Maximum Condenser System Exhaust Temperature	Maintain Temperature < 120°F	AWFCO: CPMS, HRA

[5] Continuous Process Monitoring System – See Paragraph 69.I of the CAFO.

[6] Previous six 1-minute readings are summed and divided by six.

[7] 40 C.F.R. §§ 63.1209(a)(6) and 63.1209(b)(5).

	HEPA Filter Installed and Pressure Change Monitored to Ensure Integrity of Filter	Installed and Δ Pressure Monitoring	Installation Check; Δ Pressure Monitored Once Per Shift
	Maximum TDU Feed Mercury Concentration	[Hg] < 50 ppm/Bin	Blending Protocols & Documentation[8], Feed Stream Analysis Plan (if applicable)[9]
	Maximum TDU Feed Organic Halide Concentration	[Total Organic Halides] < 1,500 ppm/Bin	Blending Protocols & Documentation, Feed Stream Analysis Plan (if applicable)
	Maximum TDU Feed Semi-Volatile Metals Concentration[10]	N/A	Blending Protocols & Documentation, Feed Stream Analysis Plan (if applicable)
	Maximum TDU Feed Low-Volatile Metals Concentration[11]	N/A	Blending Protocols & Documentation, Feed Stream Analysis Plan (if applicable)

[8] See Paragraph 69.A.3 of the CAFO.

[9] See Paragraph 69.A.11 of the CAFO.

[10] Semi-volatile metals means a combination of cadmium and lead.

[11] Low-volatile metals means a combination of Arsenic, Beryllium, and Chromium.

TABLE C

TDU OIL RECLAMATION REQUIREMENTS AFTER TOU INSTALLATION POST-COMPLIANCE DEMONSTRATION TEST OPERATIONS

Tag No.	Equipment Operating Parameter	Interim/Final (Post-Test) OPL	Compliance Basis
PT-1	TDU Dryer, Maximum Internal Pressure	Maintain Pressure < 0.00" W.C.	AWFCO: CPMS[12], 6-min RA[13]
M-05	TDU Dryer, Cylinder Rotation On	Motor Operating	AWFCO: CPMS, Instantaneous
M-18	Product Discharge System	Motor Operating	AWFCO: CPMS, Instantaneous
M-21	Recirculation Blower Operating	Motor Operating	AWFCO: CPMS, Instantaneous
TT-121	TOU, Minimum Combustion Chamber Temperature	OPL Established @ > 3-Run Average from CDT	AWFCO: CPMS, HRA[14]
KY-110	TOU, Minimum Residence Time (Calculated from Purge Vent Flow Rate, Exhaust T, and Air Ratio)	Residence Time > 0.5 seconds	AWFCO: CPMS, HRA
AE-5/ OE-5	TOU Exhaust Gas, Maximum CO Concentration	Semi-Annual Testing until Waste Analysis Plan Approved, then Annual Testing	Performance Testing in lieu of CEMS; Waste Analysis Plan based with other OPLs
OE-1	Purge Vent Gas Stream, Maximum O_2 Concentration	$[O_2] < 7\%$	AWFCO: CPMS, Instantaneous
FE-101	Maximum Purge Vent Rate	Vent Flow < 250 scfm	AWFCO: CPMS, HRA
FCV-102	Valve Position to Ensure Purge Vent is not Directed Away from TOU	Valve Closed	AWFCO: CPMS, 60-sec time delay
M-121	Minimum Percent Excess Air, Operation of Purge Vent Injector Air Supply	Purge Vent Air Supply > 20% Excess Air	AWFCO: CPMS, Tuning of Combustion Airflow

[12] Continuous Process Monitoring System – See Paragraph 69.I of CAFO.

[13] Previous six 1-minute readings are summed and divided by six.

[14] 40 C.F.R. §§ 63.1209(a)(6) and 63.1209(b)(5).

TE-28	Maximum Condenser System Exhaust Temperature	OPL Established @ < 3-run Average Based on CDT	AWFCO: CPMS, HRA
	HEPA Filter Installed and Pressure Change Monitored to Ensure Integrity of Filter	Installed and Δ Pressure Monitoring	Installation Check; Δ Pressure Monitored Once Per Shift
	Maximum TDU Feed Mercury Concentration	[Hg] < 50 ppm/Bin	Blending Protocols & Documentation[15], Feed Stream Analysis Plan (if applicable)[16]
	Maximum TDU Feed Organic Halide Concentration	OPL Established as Measured Ratio[17]	Blending Protocols & Documentation, Feed Stream Analysis Plan (if applicable)
	Maximum TDU Feed Semi-Volatile Metals Concentration[18]	OPL Established as Measured Ratio[19]	Blending Protocols & Documentation, Feed Stream Analysis Plan (if applicable)
	Maximum TDU Feed Low-Volatile Metals Concentration[20]	OPL Established as Measured Ratio[21]	Blending Protocols & Documentation, Feed Stream Analysis Plan (if applicable)

[15] See Paragraph 69.A.3 of the CAFO.

[16] See Paragraph 69.A.11 of the CAFO.

[17] Maximum TDU Feed Concentration established as a measured ratio (not to exceed 4000 ppm/bin) from emissions data collected during CDT. See plan example calculations.

[18] Semi-volatile metals means a combination of cadmium and lead.

[19] Maximum TDU Feed Concentration established as measured ration from emissions data collected during CDT. See plan example calculations.

[20] Low-volatile metals means a combination of Arsenic, Beryllium, and Chromium.

[21] Maximum TDU Feed Concentration established as measured ratio from emissions data collected during CDT. See plan example calculations.

APPENDIX 2 – BLENDING PROTOCOLS

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

DOCUMENT STORED IN FILE ROOM

APPENDIX 3

COMPLIANCE DEMONSTRATION TEST PLAN

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

DOCUMENT STORED IN FILE ROOM

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of October, 2012, the original and one copy of the foregoing Consent Agreement and Final Order (CAFO) was hand delivered to the Regional Hearing Clerk, U.S. EPA - Region 6, 1445 Ross Avenue, Dallas, Texas 75202-2733, and that true and correct copies of the CAFO were sent to the following by the method indicated below:

For US Ecology Texas, Inc.

Certified Mail – Return Receipt Requested – 7007 0710 0002 1385 1491

Mary Reagan
McGinnis, Lochridge & Kilgore, L.L.P.
600 Congress Avenue, Suite 2100
Austin, Texas 78701

For TD*X Associates LP

Certified Mail – Return Receipt Requested – 7007 0710 0002 1385 1507

J.D. Head
Fritz, Bryne, Head & Harrison, PLLC
98 San Jacinto Boulevard
Suite 2000
Austin, TX 78701

Evan L Pearson

MAIN FILE

CK ASSOCIATES
Environmental Consultants

17170 PERKINS ROAD
BATON ROUGE, LA 70810
PHONE (225) 755-1000
FAX (225) 751-2010
http://www.CKa.com

LDEQ RECEIVED

2018 JUN 29 PM 4:08

HOUSTON, TX
PHONE (281) 397-9016
FAX (281) 397-6637

LAKE CHARLES, LA
PHONE (337)625-6577
FAX (337)625-6580

SHREVEPORT, LA
PHONE (318) 797-8636
FAX (318) 798-0478

HAND DELIVERED

June 29, 2018

Louisiana Department of Environmental Quality
Office of Environmental Services
Permits Division
602 North Fifth Street
Baton Rouge, Louisiana 70802

original to IOA
copy to OTG Thregala
PAER

Re: Small Source Permit Modification Application
Thermaldyne, LLC – Port Allen Facility
Agency Interest Number 198467 ✓
Permit Number 3120-00116-00
CK Project Number 14764
PER20180002

Dear Administrator:

On behalf of Thermaldyne, LLC (Thermaldyne), CK Associates is submitting the enclosed Small Source Permit Modification Application. The facility is a minor source of criteria pollutants and of Chapter 51 toxic air pollutants and is currently permitted under Permit No. 3120-00116-00 issued November 16, 2015.

As required by the Louisiana Department of Environmental Quality (LDEQ), Thermaldyne is submitting three copies of this permit application. A check in the amount of $500 (Fee Code 1722) is also included to cover the review fees.

If you have any questions or would like further information, please contact Richard Cates of Thermaldyne at (337) 288-4600 or me at (225) 755-1000.

Sincerely,
CK Associates

Kerry Brouillette
Air Quality Program Manager

Enclosures: As stated

cc: Richard Cates – Thermaldyne

RECEIVED
JUN 29 2018
BY

Monday, July 02, 2018
1:00:26 PM

RECEIPT OF CHECK

Master AI #:	198467
Name on Check:	CK Associates, LLC
Master File Name:	Thermaldyne LLC - Port Allen Facility
Check Received Date:	6/29/2018
Check Date:	6/29/2018
Check Number:	52566
Check Amount ($):	$500.00
Staff Entry:	SUNSHINEM
Date data entered:	7/2/2018
Media:	AIR
Reason:	Modification

Comments:

SMALL SOURCE PERMIT MODIFICATION APPLICATION

Thermaldyne, LLC
Port Allen, Louisiana
West Baton Rouge Parish
Agency Interest No. 198467

June 2018

Prepared by:

17170 Perkins Road
Baton Rouge, LA 70810
225-755-1000

CK Project Number: 14764

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1.0 INTRODUCTION

Port Allen Land, LLC (PAL) applied for a small source permit in March of 2015 for a recovery/recycling facility to be located in West Baton Rouge Parish. Consequently, Small Source Permit No. 3120-00115-00 was issued on May 4, 2015. In August of 2015, an application was submitted to modify the permitted location of the facility. Permit No. 3120-00115-00 was terminated and Permit No. 3120-00116-00 was issued, both effective November 16, 2015. On May 3, 2016, Permit No. 3120-00116-00 was transferred from PAL to Thermaldyne, LLC (Thermaldyne) for the Port Allen Facility.

Thermaldyne owns and will operate the Port Allen Facility. The facility reclaims oil from oil-bearing hazardous secondary materials (OBHSM) by utilizing a 3-phase centrifuge process and an indirect thermal desorption (ITD) process. The OBHSM consists of sludges, byproducts, spent or other oil-bearing materials generated at petroleum refineries and related oil and gas operations such as pipeline systems and tank terminals. The oil that is reclaimed is returned to petroleum refineries for reinsertion into the refining process or sold as fuel in the fuel blending market. The permitted site is on approximately 28.2 acres at 2325 North Line Road in Port Allen, Louisiana in West Baton Rouge Parish. A Site Location Map is provided as Figure 1.

This Application for Approval of Emissions of Air Pollutants (AAEAP) from Minor Sources (Section 2.0) is being submitted by Thermaldyne for a modification of the permit to incorporate design changes. The facility meets the definition of small source: a facility that has the potential to emit less than 25 tons per year of any criteria pollutant, less than 10 tons per year of any toxic air pollutant, and is not otherwise considered a major source.

1.1 Process Description

Processing within Material Handling Building

All OBHSM will be unloaded within the Material Handling Building into either the Liquids Containment Area (Low Solids OBHSM) or within the Solids Containment Area (High Solids OBHSM).

The Liquids Containment Area consists of a concrete lined pit and a dewatering unit (a High Gravity linear shaker). The Liquids Containment Area is located in the northeast corner of the Material Handling Building. The Low Solids OBHSM will be unloaded into the Liquids Containment Area Pit then transferred via submersible pump into the dewatering unit (a High Gravity linear shaker). The liquid stream from the dewatering unit will be transferred via pipe to the Thermal Pad for processing in the centrifuge

system. The solid stream from the dewatering unit will be transferred via front loader to the Solids Containment Area.
The Solids Containment Area consists of that portion of the Material Handling Building not occupied by the Liquids Containment Area or other structures. The High Solids OBHSM will be unloaded within the Solids Containment Area and transferred via an auger conveyor to the Thermal Desorption Unit (TDU) for processing.

Air inside the Material Handling Building will be controlled by carbon canisters using induced draft. The control system is designed to operate with better than 75% capture and 99% control efficiency.

OBHSM will be stored within suitable physical enclosures provided with appropriate dust/vapor control measures to prevent and minimize potential fugitive emissions. Dust curtains will be used to contain potential fugitive releases, preventing release of particulate matter outside of the product receiving building. When totally enclosed, the building will operate under negative pressure.

Processing on Thermal Pad

OBHSM will be processed on the Thermal Pad in the centrifuge system and the TDU. The centrifuge system will separate the Low Solids OBHSM into individual streams: water, oil, and solids. The water will be processed through the wastewater treatment plant (also located on the Thermal Pad). The oil will be collected in tanks or containers. The solids will be conveyed to the Solids Containment Area (located in the Material Handling Building) prior to conveyance into the TDU for further reclamation.

Low Solids OBHSM

Low Solids OBHSM consists of mostly water (i.e., 70 – 90%) with the remaining mixture consisting of various oil and solids. Low Solids OBHSM is typically received in vacuum trucks or vacuum containers and pumped into the Liquids Containment Area.

The Liquids Containment Area will include a concrete lined pit with a capacity of approximately 28,726 gallons. The Liquid Containment Area, including the pit, will be located within the Material Handling Building to prevent rainwater from coming into contact with the material.

The OBHSM will be transferred from the pit to the dewatering system via a submersible slurry pump for screening through a High Gravity linear shaker. The liquid stream from the dewatering unit will be transferred via pipe to the Thermal Pad for processing in the centrifuge system. The solid stream from the dewatering unit will be transferred via front loader to the Solids Containment Area.

High Solids OBHSM

High Solids OBHSM consists of mostly solids (i.e., 40 – 70%), with the remaining volume consisting of oil and water. High Solids OBHSM are typically received in roll-off boxes or other containers. High Solids OBHSM will be offloaded into the Solids Containment Area and transferred via an auger conveyor to the TDU for processing.

Centrifuge Process

All Low Solids OBHSM will be screened over a High Gravity linear shaker and then fed to one of three 3-phase tricanting centrifuges. Water, oil, and solids will be separated into individual streams. The water will be processed through the wastewater treatment plant and then discharged or disposed. The solids will be conveyed to the TDU for further processing and recovery.

Thermal Desorption Process

Thermaldyne will use an indirect TDU to reclaim the OBHSM. Indirect thermal desorption is a non-incineration technology designed to separate hydrocarbons from various matrices including oilfield waste, soil, sludge, sand, filter cake, tank and tanker bottoms, and contaminated soil. Thermaldyne will limit OBHSM that it receives to that generated at petroleum refineries and related oil and gas operations such as pipeline systems and tank terminals. This proven thermal desorption technology is currently used to reclaim oil from oil-containing materials within petroleum refineries and at numerous commercial facilities.

In the indirect heating process, heat is applied to the exterior of the heating chamber and is transferred through the wall of the chamber to the OBHSM. Neither the burner flame nor the combustion gases come in contact with the OBHSM or the off-gases. This type of TDU is designed to maximize the recovery of the volatilized contaminants from the off-gases.

Feed System

The main components of the feed system will include single or dual-feed hoppers for material storage. The hoppers are furnished with variable speed screw auger systems in the bottom for discharge of difficult to convey material. Feed hoppers will be loaded using a front-end loader or crane operated clam-shell type bucket.

After material is discharged from a hopper, it travels via single or dual enclosed conveyors to the inlet of the TDU. The TDU feed rate is controlled by adjusting the speed of the rotation of the screw-auger system in the feed hopper bottom while all other conveying components operate at constant speed. Material preparation and pre-

treatment might be necessary during certain projects to assure good material conveying and oil reclamation.

Indirectly Heated Rotary Drum

The primary function of the indirectly heated rotary drum is to vaporize the hydrocarbons and the moisture from the incoming material. The indirectly heated drum is designed to operate at temperatures ranging from 1,200°F –1,600°F. The rotary drum is heated from outside where several burners provide the necessary process heat. The natural gas-fired unit will operate at up to 18 MMBTU per hour. The rotary drum shell material and the furnace burner capacity are designed to elevate the OBHSM temperature up to 900°F, although these higher operating temperature ranges are rarely necessary for material processing under normal conditions. The drum's material inlet and discharge are controlled via two airlocks designed to minimize air (oxygen) leakage into the drum. The inlet and discharge end of the rotary drum are equipped with custom designed seals to prevent air leakage.

During the reclamation process, as the OBHSM progresses through the rotary drum, the hydrocarbons and water undergo the evaporation (desorption) process while generating very dry solid residuals. The processed solids are conveyed at a high temperature into a conveyor where it is mixed with water for cooling before being discharged. The desorbed vapors are transported from the rotary drum into the system's Vapor Recovery Unit (VRU).

Vapor Recovery Unit

The main function of the VRU is to condense and recover the desorbed hydrocarbons, water vapor, and the solid particles present in the gas stream exiting the rotary drum. The VRU includes several main components including a quench section, venturi scrubber, separator, mist eliminator section, induced draft fan, and condenser. In the quench section, the gas stream is cooled by direct contact with finely atomized water droplets via multiple nozzles. The water spray system also removes additional solids from the gas stream.

As the gas temperature is reduced, most of the hydrocarbons are condensed before gases exit the quench section. The VRU is equipped with an integrated variable throat Venturi scrubber which removes fine solid particles from the gas stream. The dust-laden gas stream and the process water collide, dispersing the liquid into droplets that the particles impact and become entrapped within. These droplets, containing the fine solid particles, are removed from the gas stream in a horizontal cyclonic separator downstream of the Venturi scrubber.

The gas exiting the cyclonic separator passes through a mist eliminator to remove entrained water droplets before reaching the system ID fan. The process ID fan is equipped with a variable speed controlled drive, designed to maintain sufficient draft through the system to continuously transfer the vent gas through the process and control equipment. After the vent gas reaches the condenser (indirect heat exchanger), the gas temperature is reduced to less than 300°F to remove residual hydrocarbon vapors (the lighter hydrocarbons) from the gas stream.

After gas exits the condenser, it is routed through a flame arrester before being discharged into the thermal oxidizer for final polishing prior to discharge to the atmosphere.

Process Water System and Treatment

The condensates, residual fines/sediments, and water collected inside the VRU will be treated in an above ground API-type primary oil/water separator equipped with a fixed cover for VOC emission control. The recovered oil is collected using a stationary skimmer and is continuously pumped into an above ground storage tank. The recovered sediments/sludge is pumped from the API separator using a pneumatic pump and is recycled back into the TDU process. After the oil and suspended solids are removed from the influent in the API separator, the middle phase (water) is then pumped to an on-site storage tank for recycling.

A portion of the recovered water is pumped into a plate and frame heat exchanger where it is cooled and reused as cooling process water for the VRU. The cooling media for the plate and frame heat exchanger is also water. A portion of the water recaptured in the process will be processed through the wastewater treatment plant and also used to rehydrate residue from the thermal process. Water not recycled into the reclamation process and contact stormwater will be collected in containers (e.g., frac tanks) prior to treatment in its onsite wastewater treatment system.

Four package boilers will be utilized to generate steam (one on stand-by) for use in heating the heavier sludge materials to increase the ability to move these through the process.

Non-specified area sources can generate fugitive emissions from equipment that is in potential VOC service. These emissions are very small. Other emissions are from insignificant activities.

1.2 Proposed Modifications

This proposed action fits the definition of a minor modification as per LAC 33:III.525.A. Thermaldyne is requesting that minor modification procedures be used when processing this permit application. With this modification application, Thermaldyne is proposing several changes, described below.

Thermaldyne proposes to change the description of UNF 0001 from PAL LLC – Entire Facility-Port Allen Land, LLC to Thermaldyne, LLC – Entire Facility.

Thermaldyne proposes to change the description of CON 0002 from TDU Oxidizer Vent to Thermal Oxidizer.

Thermaldyne proposes to delete CON 0001, CSTK-1 – TDU Oxidizer/Desorber Common Stack to remove permitting of a common stack. The emissions that are currently permitted under CON 0001 are now proposed to be permitted under CON 0002, 1-2015 – Thermal Oxidizer and EQT 0008, 2-2015 – Desorber Heater (separate stacks).

There are no proposed changes to the Desorber Heater emission rates. The Thermal Oxidizer (CON 0002) is now proposed to only control the TDU Desorber Vent (EQT 0001) whereas in the current permit, CON 0002 controls:

- EQT 0001, 1-2015(a) – TDU Desorber Vent;
- EQT 0002, 1-2015(b) – Oil/Water Separator;
- EQT 0003, 1-2015(ca) – TK-1;
- EQT 0004, 1-2015(cb) – TK-2;
- EQT 0005, 1-2015(cc) – TK-3;
- EQT 0006, 1-2015(cd) – TK-4; and
- EQT 0007, 1-2015(ce) – TK-5.

Tanks 1-5 (EQT 0003 through EQT 0007, TK-1 through TK-5) are proposed to be deleted. These tanks are permitted for product, water treatment, mixing, and diesel. In the place of the product, mixing, and diesel tanks, Thermaldyne proposes to add the following atmospheric tanks:

- EQT TBD, 12-2018 - Product Tank No. 1;
- EQT TBD, 13-2018 - Product Tank No. 2;
- EQT TBD, 14-2018 - Oil Tank No. 1;
- EQT TBD, 15-2018 - Water Tank No. 1;
- EQT TBD, 16-2018 - Water Tank No. 2 (from Centrifuge);
- EQT TBD, 17-2018 - Oil Tank No. 2 (from Centrifuge);
- EQT TBD, 18-2018 - Blending Tank No. 1;
- EQT TBD, 19-2018 - Blending Tank No. 2;
- EQT TBD, 20-2018 - Process Tank No. 1;

- EQT TBD, 21-2018 - Process Tank No. 2; and
- EQT TBD, 22-2018 - Process Tank No. 3.

EQT 0002, 1-2015(b) – Oil/Water Separator is proposed to change to EQT 0002, 11-2018 – Wastewater Treatment System. Included with the system will be replacement tanks for EQT 0004 and EQT 0005 mentioned above that are currently permitted for water treating chemicals.

Thermaldyne proposes to rename EQT 0011, 6-2015 – Package Boiler to Package Boiler No. 1 and to add the following sources:

- EQT TBD, 7-2018 – Package Boiler No. 2;
- EQT TBD, 8-2018 - Package Boiler No. 3; and
- EQT TBD, 9-2018 - Package Boiler No. 4.

The following emission point sources are also proposed to be added:

- EQT TBD, 10-2018 - Material Handling Building;
- EQT TBD, 23-2018 - Roll-off Boxes;
- EQT TBD, 24-2018 - TDU Solids Loading;
- EQT TBD, 25-2018 - Finished Catalyst Loading;
- EQT TBD, 26-2018 - Catalyst Solids Loading;
- EQT TBD, 27-2018 – Catalyst Screening;
- EQT TBD, 28-2018 - Processed Solids Discharge Conveyor; and
- EQT TBD, 29-2018 - Emergency Diesel Generator.

Thermaldyne proposes to delete EQT 0010, 5-2015 – Baghouse. Material handling located in the Material Handling Building (EQT TBD, 10-2018) is proposed to be controlled with capture (75% efficiency) and scrubber/carbon bed control (99% efficiency).

There are no proposed changes to the fugitives (FUG 0001, 3-2015 – Fugitive Emissions) or loading (EQT 0009, 4-2015 – Loading Emissions) emission rates.

Thermaldyne proposed to increase the number of tank cleanings for the current permitted GCXVII Activity and add carbon bed maintenance and strainer maintenance. New Insignificant Activities proposed are two (2) diesel tanks per LAC 33:III.501.B.5.A.3.

1.3 Regulatory Applicability

Section 19 of the AAEAP contains the air quality requirements for the affected sources included in this minor source permit modification application.

Thermaldyne requests removal of LAC 33:III.1311.C from CON 0002, EQT 0008, and EQT 0011 and the addition of LAC 33:III.1313.C to CON 0002 and EQT 0011.

1.4 Proposed Emission Changes

With this modification, the facility will remain a minor source of regulated air pollutants. Tabulated emissions are provided in Table 1 below.

Table 1
Facility Emissions Summary

Pollutant	Permitted Emissions (tpy)	Proposed Emissions (tpy)	Net Change (tpy)
PM_{10}	4.57	1.52	-3.05
$PM_{2.5}$	4.57	1.50	-3.07
SO_2	0.14	0.13	-0.01
NO_x	11.81	20.15	8.34
CO	18.03	18.22	0.19
Total VOC	20.00	24.48	4.48

2.0 APPLICATION FOR APPROVAL OF EMISSIONS OF AIR POLLUTANTS FROM MINOR SOURCES

Department of Environmental Quality Office of Environmental Services Air Permits Division P.O. Box 4313 Baton Rouge, LA 70821-4313 (225) 219-3417	**LOUISIANA** **Application for Approval of Emissions of Air Pollutants from Minor Sources**	DEQ LOUISIANA

PLEASE TYPE OR PRINT

1. Facility Information [LAC 33:III.517.D.1]

Facility Name (if any) Port Allen Facility	
Agency Interest Number (A.I. Number) 198467	**Currently Effective Permit Number(s)** 3120-00116-00
Company - Name of Owner Thermaldyne, LLC	
Company - Name of Operator (if different from Owner)	
Parent Company (if Company – Name of Owner given above is a division)	

Ownership:
Check the appropriate box.

☐ corporation, partnership, or sole proprietorship ☐ regulated utility ☐ municipal government

☐ state government ☐ federal government ☒ other, specify LLC

2. Physical Location and Process Description [LAC 33:III.517.D.18, unless otherwise stated]

What does this facility produce? Add more rows as necessary.
This facility processes oil-bearing hazardous secondary materials for oil reclamation.

What modifications/changes are proposed in this application? Add more rows as necessary.
See Section 1.2 of the report text.

Nearest town (in the same parish as the facility): Port Allen

Parish(es) where facility is located: West Baton Rouge

Distance To (mi):	142 Texas	170 Arkansas	32 Mississippi	166 Alabama
Latitude of Facility Front Gate:	30 Deg	29 Min	26 Sec	0.3 Hundredths
Longitude of Facility Front Gate:	-91 Deg	13 Min	06 Sec	0.01 Hundredths

Add physical address and description of location of the facility below. If the facility has no address, provide driving directions. Add more rows as necessary.
2325 North Line Road, Port Allen, LA 70767

☒ Map attached (required per LAC 33:III.517.D.1)
☒ Description of processes and products attached (required per LAC 33:III.517.D.2)
☒ Introduction/Description of the proposed project attached (required per LAC 33:III.517.D.5)
☐ Evidence of compliance with local zoning ordinance for proposed location (required per LAC 33:III.513.C.1.a; for Portable Facilities only)

3. Confidentiality [LAC 33.I.Chapter 5]

Are you requesting confidentiality for any information except air pollutant emission rates? ☐ Yes ☒ No

If "yes," list the sections for which confidentiality is requested below. Add rows as necessary. Confidentiality requests require a submittal that is separate from this application. Information for which confidentiality is requested should not be submitted with this application. Consult instructions.

4. Type of Application [LAC 33:III.517.D]

Check all that apply.

☐ Minor Source ☐ Synthetic Minor Source ☒ Small Source ☐ Portable Facility
☐ Minor Source Oil & Gas General Permit (MSOG)* ☐ Minor Source Surface Coating and Fabrication General Permit (SCF)*
☐ Renewal
Select one, if applicable: ☐ Entirely new facility ☒ Modification or expansion of existing facility (may also include reconciliations) ☐ Reconciliation only

*Additional separate submittal required. See instructions for more details.

If "Portable Facility" was selected above, please enter the Make, Model, and Serial Number of each portable combustion emissions source to be permitted. Otherwise, leave blank. Do *NOT* list any motor vehicles. Add rows as necessary.

Make	Model	Serial Number

Does this submittal update or replace an application currently under review? ☐ Yes ☒ No

If yes, provide date that the prior application was submitted: _____

Select one if this application is for an existing facility that does not have an air quality permit:

☐ Previously Grandfathered (LAC 33:III.501.B.6)
☐ Previously Exempted (e.g., Small Source Exemption; LAC 33:III.501.B.2.d)
☐ Previously Unpermitted

5. Fee Information [LAC 33:III.517.D.17]

Fee Parameter: If the fee code is based on an operational parameter (such as number of employees or capital cost), enter that parameter here. _____

Industrial Category: Enter the Standard Industrial Classification (SIC) Codes that apply to the facility.

Primary SICC: 2992 **Primary NAICS Code:** 324191

Secondary SICC(s): _____

Project Fee Calculation: Enter fee code, permit type, production capacity/throughput, and fee amount pursuant to LAC 33:III.Chapter 2. Include with the application the amount in the Grand Total blank as the permit application fee.

FEE CODE	TYPE	EXISTING CAPACITY	INCREMENTAL CAPACITY INCREASE	*SURCHARGES*			
				MULTIPLIER	NSPS	AIR TOXICS	TOTAL AMOUNT
1722	Minor				☐	☐	$500
					GRAND TOTAL		$500

Optional **Fee Explanation:** Use the space provided to give an explanation of the fee determination displayed above.

Electronic Fund Transfer (EFT): If paying the permit application fee using an Electronic Fund Transfer (EFT), please include the EFT Transaction Number, the Date that the EFT was made, and the total dollar amount submitted in the EFT. If not paying the permit application fee using EFT, leave blank.

EFT Transaction Number	Date of Submittal	Total Dollar Amount
		$

6. Key Dates

Estimated date construction will commence: On-going *Estimated date operation will commence:* 9/1/18

7. LAC 33:I.1701 Requirements – Answer all below for new sources and permit renewals - ☐ Yes ☒ No

Does the company or owner have federal or state environmental permits identical to, or of a similar nature to, the permit for which you are applying in Louisiana or other states? (This requirement applies to all individuals, partnerships, corporations, or other entities who own a controlling interest of 50% or more in your company, or who participate in the environmental management of the facility for an entity applying for the permit or an ownership interest in the permit.) ☐ **Yes** ☐ **No**

If yes, list States: _____

Do you owe any outstanding fees or final penalties to the Department? ☐ **Yes** ☐ **No**
If yes, explain below. Add rows if necessary.

_____

_____

_____

Is your company a corporation or limited liability company? ☐ **Yes** ☐ **No**
If yes, attach a copy of your company's Certificate of Registration and/or Certificate of Good Standing from the Secretary of State. The appropriate certificate(s) should be attached to the end of this application as an appendix.

8. Certification of Compliance With Applicable Requirements

Statement for Applicable Requirements for Which the Company and Facility Referenced In This Application Is In Compliance

Based on information and belief, formed after reasonable inquiry, the company and facility referenced in this application is in compliance with and will continue to comply with all applicable requirements pertaining to the sources covered by the permit application, as outlined in Tables 1 and 2 in the permit application. For requirements promulgated as of the date of this certification with compliance dates effective during the permit term, I further certify that the company and facility referenced in this application will comply with such requirements on a timely basis and will continue to comply with such requirements.

For corporations only: By signing this form, I certify that, in accordance with the definition of Responsible Official found in LAC 33:III.502, **(1)** I am a president, secretary, treasurer, or vice-president in charge of a principal business function, or other person who performs similar policy or decision-making functions; or **(2)** I am a duly authorized representative of such person; am responsible for the overall operation of one or more manufacturing, production, or operating facilities addressed in this permit application; and either the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars); or the delegation of authority has been approved by LDEQ prior to this certification.*

CERTIFICATION: I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this Application for Approval of Emissions of Air Pollutants from Minor Sources, including all attachments thereto and the compliance statement above, are true, accurate, and complete.

a. Responsible Official		
Name Richard Cates		
Title President		
Company Thermaldyne, LLC		
Suite, mail drop, or division		
Street or P.O. Box 45 Maryeanna Drive		
City Atlanta	State Georgia	Zip 30342
Business phone 337-288-4600		
Email Address rcates@thermaldyne.com		

Signature of responsible official (See LAC 33:III.502):
Date: 6/20/18

*Approval of a delegation of authority can be requested by completing a Duly Authorized Representative Designation Form (Form_7218) available on LDEQ's website at http://deq.louisiana.gov/page/air-permit-applications

9. Personnel [LAC 33:III.517.D.1]

a. Manager of Facility who is located at plant site		
Name Richard Cates	☒Primary contact	
Title President		
Company Thermaldyne, LLC		
Suite, mail drop, or division		
Street or P.O. Box 45 Maryeanna Drive		
City Atlanta	**State** Georgia	**Zip** 30342
Business phone 337-288-4600	**Mobile Phone** 337-288-4600	
Email address rcates@thermaldyne.com		

b. On-site contact regarding air pollution control		
Name	☒Primary contact	
Title		
Company		
Suite, mail drop, or division		
Street or P.O. Box		
City	**State**	**Zip**
Business phone	**Mobile Phone**	
Email address		

c. Person to contact with written correspondence		
Name	☒Primary contact	
Title		
Company		
Suite, mail drop, or division		
Street or P.O. Box		
City	**State**	**Zip**
Business phone		
Email address		

d. Person who prepared this report		
Name	☒Primary contact	
Title		
Company		
Suite, mail drop, or division		
Street or P.O. Box		
City	**State**	**Zip**
Business phone		
Email address		

e. Person to contact about Annual Maintenance Fees	☒ a ☐ b ☐ c ☐ d ☐ other (specify below)	
Name	☒Primary contact	**Suite, mail drop, or division**
Title		**Street or P.O. Box**
Company		**City** / **State** / **Zip**
Business Phone		**Email Address**

10. Proposed Project Emissions [LAC 33:III.517.D.3]

List the total emissions following the proposed project for this facility or process unit (for process unit-specific permits). Speciate all criteria pollutants, TAP, and HAP for the proposed project.

Pollutant	Proposed Emission Rate (tons/yr)
Particulate Matter (PM_{10})	1.52
Particulate Matter ($PM_{2.5}$)	1.50
Sulfur Dioxide (SO_2)	0.13
Nitrogen Oxides (NO_x)	20.15
Carbon Monoxide (CO)	18.22
Total VOC (includes those listed)	24.48
Carbon Dioxide (CO_2e)	22,166
Benzene	0.56
Biphenyl	0.002
1,3 Butadiene	0.002
Cresol	0.004
Cumene	0.003
Ethylbenzene	0.02
n-Hexane	0.11
Naphthalene	0.01
Phenol	0.002
PAH	0.002
Styrene	0.002
Toluene	0.14
1,2,4-Trichlorobenzene	0.03
2,2,4-Trimethylpentane	0.002
Xylenes	0.27

11. History of Permitted Emissions [LAC 33:III.517.D.18]

List each of the following in chronological order:

- The Permit Number and Date Action Issued for each air quality permit that has been issued to this facility or process unit (for process unit-specific permits) within the last ten (10) years.
- All small source exemptions, authorizations to construct, administrative amendments, case-by-case insignificant activities, and changes of tank service that have been approved since the currently effective Title V Operating Permit or State Operating Permit was issued to this facility or process unit (for process unit-specific permits). It is not necessary to list any such activities issued prior to the issuance of the currently effective Title V Operating Permit or State Operating Permit, if one exists.

Permit Number	Date Action Issued
3120-00115-00	5/4/2015 Permit was terminated 3/14/16
3120-00116-00	3/14/16

12.a. Enforcement Actions [LAC 33:III.517.D.18]- ☐ Yes ☒ No

If yes, list all federal and state air quality enforcement actions, settlement agreements, and consent decrees received for this facility since the issuance of the currently effective Title V Operating Permit or State Operating Permit. For each action, list the type of action (or its tracking number), the regulatory authority or authorities that issued the action, and the date that the action was issued. Summarize the conditions imposed by the enforcement action, settlement agreement, and consent decree in Section 19, Table 2. It is not necessary to submit a copy of the referenced action. Add rows to table as necessary.

Type of Action or Tracking Number	Issuing Authority	Date Action Issued	Summary of Conditions Included?
			☐ Yes ☐ No
			☐ Yes ☐ No

12.b. Schedule for Compliance [LAC 33:III.517.D.16] ☐ Yes ☒ No

If the facility for which application is being made is not in full compliance with all applicable regulations, give a description of how compliance will be achieved, including a schedule for compliance below. Add rows as necessary. See instructions.

13. Letters of Approval for Alternate Methods of Compliance- ☐ Yes ☒ No

If yes, list all correspondence with LDEQ, EPA, or other regulatory bodies that provides for or supports a request for alternate methods of compliance with any applicable regulations for this facility. List the date of issuance of the letter and the regulation referenced by the letter. **Attach as an appendix a copy of all documents referenced in this table.** Letters that are not included may not be incorporated into a final permit. Add rows to table as necessary.

Date Letter Issued	Issuing Authority	Referenced Regulation(s)	Copy of Letter Attached?
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No

14. Initial Notifications and Performance Tests [LAC 33:III.517.D.18] - ☐ Yes ☒ No

If yes, list any initial notifications that have been submitted or one-time performance tests that have been performed for this facility since the issuance of the currently effective Title V Operating Permit or State Operating Permit in order to satisfy regulatory requirements. Any initial notification or one-time performance test requirements that have not been satisfied should be listed in Section 19, Table 2 of this application. Any notifications or performance tests that recur periodically should also be properly noted in Section 19, Table 2 of this application. Add rows to table as necessary.

Initial Notification or One-time Performance Test?	Regulatory Citation Satisfied	Date Completed/Approved

15. Air Quality Dispersion Modeling [LAC 33:III.517.D.15]

Was Air Quality Dispersion Modeling as required by LAC 33:III performed in support of this permit application? (Air Quality Dispersion Modeling is required when requested by LDEQ.)

☐ **Yes** ☒ **No**

Has Air Quality Dispersion Modeling completed in accordance with LAC 33:III ever been performed for this facility in support of an air permit application previously submitted for this facility or as required by other regulations AND approved by LDEQ?

☐ **Yes** ☒ **No**

If yes, enter the date the most recent Air Quality Dispersion Modeling results as required by LAC 33:III were submitted:

_____

If the answer to either question above is "yes," enter a summary of the most recent results in the following table. If the answer to both questions is "no," enter "none" in the table. Add rows to table as necessary.

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Standard or (National Ambient Air Quality Standard (NAAQS))

16. General Condition XVII Activities [LAC 33:III.537]- ☒ Yes ☐ No

Enter all activities that qualify as Louisiana Air Emissions Permit General Condition XVII Activities.

- Expand this table as necessary to include all such activities.
- See instructions to determine what qualifies as a General Condition XVII Activity.
- Do not include emissions from General Condition XVII Activities in the proposed emissions totals for the permit application.
- The "Schedule" blank for each proposed General Condition XVII Activity is a **required** entry.

		Emission Rates – TPY					
Work Activity	**Schedule**	**PM_{10}**	**SO_2**	**NO_x**	**CO**	**VOC**	**Other**
Tank Cleaning	Twenty per year					3.03 tpy	
Carbon Bed Maintenance	Twice per month					0.12 tpy	
Strainer Maintenance	Once per month					0.04 tpy	

17. Insignificant Activities [LAC 33:III.501.B.5] - ☒ Yes ☐ No

Enter all activities that qualify as Insignificant Activities.

- Expand this table as necessary to include all such activities.
- For sources claimed to be insignificant based on size or emission rate (LAC 33:III.501.B.5.A), information must be supplied to verify each claim. This may include but is not limited to operating hours, volumes, and heat input ratings.
- If aggregate emissions from all similar pieces of equipment claimed to be insignificant are greater than 5 tons per year for any pollutant, then the activities can not be claimed as insignificant and must be represented as permitted emission sources. Aggregate emissions shall mean the total emissions from a particular insignificant activity or group of similar insignificant activities (e.g., A.1, A.2, etc.) within a permit per year.

Emission Point ID No.	Description	Physical/Operating Data	Citation
IA No. 1	Diesel Tank	1,000 gal	LAC 33:III.501.B.5.A.3
IA No. 2	Diesel Tank	250 gal	LAC 33:III.501.B.5.A.3

18. Regulatory Applicability for Commonly Applicable Regulations – Answer all below [LAC 33:III.517.D.10]

Does this facility contain asbestos or asbestos containing materials? ☐ **Yes** ☒ **No**
If "yes," the facility or any portion thereof may be subject to 40 CFR 61, Subpart M, LAC 33:III.Chapter 27, and/or LAC 33:III.5151, and this application must address compliance as stated in Section 19 of this application.

Is the facility represented in this permit subject to 40 CFR 68? ☐ **Yes** ☒ **No**
If "yes," the entire facility is subject to 40 CFR 68 and LAC 33:III.Chapter 59, and this application must address compliance as stated in Section 19 of this application.

Is the facility listed in LAC 33:III.5611?

Table 5 ☐ **Yes** ☒ **No**

Table 6 ☐ **Yes** ☒ **No**

Table 7 ☐ **Yes** ☒ **No**

Does the applicant own or operate commercial refrigeration equipment normally containing more than 50 pounds of refrigerant at this facility? ☐ **Yes** ☒ **No**
If "yes," the entire facility is subject to 40 CFR 82, Subpart F, and this application must address compliance as stated in Section 19 of this application.

19. Applicable Regulations, Air Pollution Control Measures, Monitoring, and Recordkeeping

Important points for Table 1 [LAC 33:III.517.D.10]:

- List in Table 1, by Emission Point ID Number and Descriptive Name of the Equipment, state and federal pollution abatement programs and note the applicability or non-applicability of the regulations to each source.
- Adjust the headings for the columns in Table 1 as necessary to reflect all applicable regulations, in addition to any regulations that do not apply but require an explanation to substantiate this fact.
- For each piece of equipment, enter "1" for each regulation that applies. Enter "2" for each regulation that applies to this type of source, but from which this source of emissions is exempt. Enter "3" for equipment that is subject to a regulation, but does not have any applicable requirements. Also, enter "3" for each regulation that has applicable requirements that apply to the particular emission source, but the regulations currently do not apply due to meeting a specific criterion, such as it has not been constructed, modified, or reconstructed since the regulations have been in place.
- Leave the spaces blank when the regulations clearly would not apply under any circumstances to the source. For example, LAC 33:III.2103 – Storage of Volatile Organic Compounds would never apply to a steam generating boiler, no matter the circumstances.
- Consult instructions.

Important points for Table 2 [LAC 33:III.517.D.10]:

- For each piece of equipment listed in Table 2, include all applicable limitations, recordkeeping, reporting, monitoring, and testing requirements. Also, include any one-time notification or one-time performance test requirements that have not been fulfilled.
- Each of these regulatory aspects (limitations, recordkeeping, reporting, etc.) should be addressed for each regulation that is applicable to each emissions source or emissions point.
- For each regulation that provides a choice regarding the method of compliance, indicate the method of compliance that will be employed. It is not sufficient to state that all compliance options will be employed, though multiple compliance options may be approved as alternative operating scenarios.
- Consult instructions.

Important points for Table 3 [LAC 33:III.517.D.16]:

- Each time a 2 or a 3 is used to describe applicability of a source in Table 1, an entry should be made in Table 3 that explains the exemption or non-applicability status of the regulation to that source.
- Fill in all requested information in the table.
- The exact regulatory citation that provides for the specific exemption or non-applicability determination should be entered into the "Citation Providing for Exemption or Non-applicability" column.
- Consult Instructions.

Important points for Table 4 [LAC 33:III.517.D.18]:

- List any single emission source that routes its emissions to another point where these emissions are commingled with the emissions of other sources before being released to the atmosphere. Do not list any single emission source in this table that does not route its emissions in this manner.
- List any and all emission sources that are routed as described above. This includes emission sources that do not otherwise appear in this permit application.
- Consult instructions.

TABLE 1: APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS
Thermaldyne, LLC - Port Allen Facility
West Baton Rouge Parish, Louisiana

Source		LAC 33:III.Chapter										LAC 33:III.				
ID No.:	Descriptive Name of the Source	5	9	11	13	15	22	29	51	56	59	2103	2109	2113	2115	2121
UNF 0001	Thermaldyne, LLC - Entire Facility	1	1	1	1		1		3	1	3			1	3	3
CON 0002	1-2015 - Thermal Oxidizer	1		1	1	3	2									
EQT 0001	1-2015(a) - TDU Desorber Vent															
EQT 0002	11-2018 - Wastewater Treatment Plant												2			
EQT 0008	2-2015 - Desorber Heater			1	1	3	2									
EQT 0011	6-2015 - Package Boiler No. 1			3	1	3	2									
EQT TBD	7-2018 - Package Boiler No. 2			3	1	3	2									
EQT TBD	8-2018 - Package Boiler No. 3			3	1	3	2									
EQT TBD	9-2018 - Package Boiler No. 4			3	1	3	2									
EQT TBD	10-2018 - Material Handling Building		1												2	
EQT TBD	10-2018(a) - Low Solids OBHSM Pit														2	
EQT TBD	10-2018(b)- Dewatering Unit														2	
EQT TBD	10-2018(c) - Solids Containment Area														2	
EQT TBD	10-2018(d) - Cleaning of Trucks & Roll-off Boxes														2	
EQT TBD	12-2018 - Product Tank No. 1											3				
EQT TBD	13-2018 - Product Tank No. 2											3				
EQT TBD	14-2018 - Oil Tank No. 1											3				
EQT TBD	15-2018 - Water Tank No. 1											3				
EQT TBD	16-2018 - Water Tank No. 2 (from Centrifuge)											3				
EQT TBD	17-2018 - Oil Tank No. 2 (from Centrifuge)											3				
EQT TBD	18-2018 - Blending Tank No. 1											3				
EQT TBD	19-2018 - Blending Tank No. 2											3				
EQT TBD	20-2018 - Process Tank No. 1											3				
EQT TBD	21-2018 - Process Tank No. 2											3				
EQT TBD	22-2018 - Process Tank No. 3											3				
EQT TBD	23-2018 - Roll-off Boxes				1											
EQT TBD	24-2018 - TDU Solids Loading				1											
EQT TBD	25-2018 - Finished Catalyst Loading				1											
EQT TBD	26-2018 - Catalyst Solids Loading				1											
EQT TBD	27-2018 - Catalyst Screening				1											
EQT TBD	28-2018 - Processed Solids Discharge Conveyor				1											
EQT TBD	29-2018 - Emergency Diesel Generator			1	1	3	2									

TABLE 1: APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS
Thermaldyne, LLC - Port Allen Facility
West Baton Rouge Parish, Louisiana

Source		40 CFR 60						40 CFR 61		40 CFR 63			40 CFR		
ID No.:	Descriptive Name of the Source	A	D	Db	Dc	Kb	IIII	A	FF	A	VV	ZZZZ	64	68	82
UNF 0001	Thermaldyne, LLC - Entire Facility												3	3	3
CON 0002	1-2015 - Thermal Oxidizer		3	3	3										
EQT 0001	1-2015(a) - TDU Desorber Vent														
EQT 0002	11-2018 - Wastewater Treatment Plant														
EQT 0008	2-2015 - Desorber Heater		3	3	3										
EQT 0011	6-2015 - Package Boiler No. 1				3										
EQT TBD	7-2018 - Package Boiler No. 2				3										
EQT TBD	8-2018 - Package Boiler No. 3				3										
EQT TBD	9-2018 - Package Boiler No. 4				3										
EQT TBD	10-2018 - Material Handling Building														
EQT TBD	10-2018(a) - Low Solids OBHSM Pit														
EQT TBD	10-2018(b)- Dewatering Unit														
EQT TBD	10-2018(c) - Solids Containment Area														
EQT TBD	10-2018(d) - Cleaning of Trucks & Roll-off Boxes														
EQT TBD	12-2018 - Product Tank No. 1					3									
EQT TBD	13-2018 - Product Tank No. 2					3									
EQT TBD	14-2018 - Oil Tank No. 1					3									
EQT TBD	15-2018 - Water Tank No. 1					3									
EQT TBD	16-2018 - Water Tank No. 2 (from Centrifuge)					3									
EQT TBD	17-2018 - Oil Tank No. 2 (from Centrifuge)					3									
EQT TBD	18-2018 - Blending Tank No. 1					3									
EQT TBD	19-2018 - Blending Tank No. 2					3									
EQT TBD	20-2018 - Process Tank No. 1					3									
EQT TBD	21-2018 - Process Tank No. 2					3									
EQT TBD	22-2018 - Process Tank No. 3					3									
EQT TBD	23-2018 - Roll-off Boxes														
EQT TBD	24-2018 - TDU Solids Loading														
EQT TBD	25-2018 - Finished Catalyst Loading														
EQT TBD	26-2018 - Catalyst Solids Loading														
EQT TBD	27-2018 - Catalyst Screening														
EQT TBD	28-2018 - Processed Solids Discharge Conveyor														
EQT TBD	29-2018 - Emergency Diesel Generator	1					1					1			

KEY:

1 The regulations have applicable requirements, which apply to this particular emission source. The emissions source may have an exemption from the control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.

2 The regulations have applicable requirements, which may apply to this particular emissions source, but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has been constructed, modified, or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.

3 The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

MAY - 6 2015

AIR PERMIT ROUTING/APPROVAL SLIP-Permits

AI No.	195964	Company	Port Allen Land LLC	Date Received	3/25/2015
Activity No.	PER20150001	Facility	Port Allen Facility	Permit Type	Syngte Minor Mod
CDS No.	3120-00115	Permit No.	3120-00115-00	Expedited Permit	☒yes ☐no

1. Technical Review		Approved	Date rec'd	Date FW	Comments
Permit Writer	CEW	CEW	3/26/15	4/28/15	
Air Quality / Modeling					
Toxics					
Technical Advisor		Dgw		4/30/15	
Supervisor		RJT		4/29/15	ok as noted
Other					
2. Management Review (if PN req'd)		**Approved**	**Date rec'd**	**Date FW**	**Comments**
Supervisor					
Manager					
Assistant Secretary (PN)					
3. Response to Comments (if PN req'd)		**Approved**	**Date rec'd**	**Date FW**	**Comments**
Supervisor					
Manager					
Administrator					
Legal (BFD)					
4. Final Approval		**Approved**	**Date rec'd**	**Date FW**	**Comments**
Supervisor					
Manager					
Administrator		CSN		5/4/15	
Assistant Secretary		FBT		5/4/15	

1. Technical Review							
PN of App needed	☐ yes ☒ no	Date of PN of App		Newspaper			
Fee paid	☒ yes ☐ no						
NSPS applies	☐ yes ☒ no	PSD/NNSR applies	☐ yes ☒ no	NESHAP applies	☐ yes ☒ no		

2. Post-Technical Review					
Company technical review	☐ yes ☒ no ☐ n/a	E-mail date		Remarks received	☐ yes ☐ no
Surveillance technical review	☒ yes ☐ no ☐ n/a	E-mail date		Remarks received	☐ yes ☐ no

3. Public Notice					
Public Notice Required	☐yes ☒no				
Library					
PN newspaper 1/City	*The Advocate*/Baton Rouge	PN Date		EDMS Verification	☐ yes ☐ no
PN newspaper 2/City		PN Date			☐ yes ☐ no
Company notification letter sent	Date mailed				
EPA PN notification e-mail sent	Date e-mailed				
OES PN mailout	Date				

4. Final Review					
Public comments received	☐ yes ☐ no	EPA comments rec'd	☐ yes ☐ no	Date EPA Resp. to Comments-mailed	
Company comments received	☐ yes ☐ no	PN info entered into Permit Sec VI	☐ yes ☐ no	Date EPA approved permit	
Comments					

BOBBY JINDAL
GOVERNOR

PEGGY M. HATCH
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY

ENVIRONMENTAL SERVICES

Certified Mail No.: 7014 0510 0002 3394 7206

Activity No.: PER20150001
Agency Interest No.: 195964

Mr. Mike Yawn
CEO, Port Allen Land LLC
2300 Trowbridge Rd
Albany, GA 31707

RE: Permit, Port Allen Land LLC, Port Allen Facility
Port Allen, West Baton Rouge Parish, Louisiana

Dear Mr. Yawn:

This is to inform you that the permit request for the above referenced facility has been approved under LAC 33:III.501. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets, and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Also enclosed is a document entitled "General Information." Please be advised that this document contains a summary of facility-level information contained in LDEQ's TEMPO database and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may email your changes to facupdate@la.gov.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight, ten years from the issue date below, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

The permit number cited below and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this 4 day of May, 2015.

Permit No.: 3120-00115-00

Sincerely,

Tegan B. Treadaway

Tegan B. Treadaway
Assistant Secretary
TBT:cew

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Port Allen Land LLC
Agency Interest No.: 195964
Port Allen Land LLC
Port Allen, West Baton Rouge Parish, Louisiana

I. BACKGROUND

Port Allen Land LLC (PAL), Port Allen Facility, is proposing to build and operate an indirect fired Thermal Desorption Unit (TDU), which will be located on the west bank of the Mississippi River in Port Allen, West Baton Rouge Parish, Louisiana. The facility will process non- hazardous materials to recover and recycle valuable materials. These materials can include oil-bearing secondary wastes, sludges, and other oilfield and refinery materials.

II. ORIGIN

A permit application and Emissions Inventory Questionnaire (EIQ) dated March 25, 2015, were received requesting a permit. Additional information dated April 7, 21 and 27, 2015, was also received.

III. DESCRIPTION

Port Allen Land, LLC (PAL), is proposing to build and operate an indirect fired Thermal Desorption Unit (TDU), which will process a variety of petroleum and oil-bearing materials to recover and recycle useful hydrocarbon materials that would otherwise be disposed of in a landfill.

The petroleum materials will be fed to an indirect-fired, natural gas fueled TDU where the hydrocarbons will be liberated from the substrate materials by raising them beyond their boiling points to about 900 degrees Fahrenheit. Heavier materials such as any metals and inert materials will drop out of the dryer in solid form. The vent stream carrying the hydrocarbons will pass through a series of recovery equipment including a cyclone, hydroclone, and a venturi scrubber. Any remaining constituents of the vent stream will be processed through an acid gas scrubber and a thermal oxidizer. The clean effluent gas from the oxidizer will be routed back to the shell of the dryer for increased thermal efficiency. Water from the scrubber will be routed through the water treatment system where additional material recovery will occur. The materials recovered will include clean solid substrates and liquid hydrocarbons.

The thermal oxidizer will control the emissions from the desorber vent, oil water separator, and the storage tanks at the facility and is designed to operate with a better than 99.9% destruction efficiency, but for conservative reasons, the efficiency will be set at 99%. Emissions of residual hydrocarbons will be very small.

The majority of the hydrocarbons that are present in the feed materials will be recovered in the process. The small amounts of lighter hydrocarbons that cannot be recovered are controlled in

the thermal oxidizer. Additionally, there is a vent stream containing recovered hydrocarbons that is routed to the recovery equipment and then to the control equipment. After passing through the oxidizer, this hot vent stream will be passed through the shell of the desorber to increase desorber energy efficiency.

The process water will be sent through an oil separator to recover additional hydrocarbon materials. These materials will be added to the recovered oil for re-sale.

Recovered hydrocarbons and in-process waste water will be stored in tanks. The hydrocarbons will be sold offsite and the water will be treated and returned to the process.

The TDU will operate at 40 MMBTU per hour. The triple shell indirect-fired rotary desorber will heat the materials being fed without direct contact. The desorber is fired by natural gas.

Recovered hydrocarbons will be equivalent to lube oil in physical characteristics. This material will be loaded into tank trucks periodically for sale to other users.

The baghouse controls any particulate emissions that originate from the solids cooling and controlling auger. It will be used to remove the majority of any particulates that are generated during the solids recovery process.

A package boiler will be utilized to generate steam for use in heating the heavier sludge materials to increase the ability to move these through the process.

Non-specified area sources can generate fugitive emissions from equipment that is in potential VOC service. These emissions are very small. Other emissions are from insignificant activities.

There are no other facilities owned by PAL and contiguous with the TDU facility.

Port Allen Land LLC
Agency Interest No.: 195964
Port Allen Land LLC
Port Allen, West Baton Rouge Parish, Louisiana

Estimated emissions from this facility in tons per year are as follows:

Pollutant	Emissions (TPY)
PM_{10}	4.57
$PM_{2.5}$	4.57
SO_2	0.14
NO_X	11.81
CO	18.03
VOC	12.25

LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs)*:

Pollutant	Emissions (TPY)
Benzene	0.41
1,2,4-Trichlorobenzene	0.02
Total	*

IV. TYPE OF REVIEW

This permit was reviewed for compliance with Louisiana Air Quality Regulations. New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD)/Non-attainment New Source Review (NNSR) do not apply.

*This proposed facility will be a minor source of LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs). The Port Allen Facility is being permitted to service a wide variety of non-hazardous materials that can contain very different chemical components. The facility will be receiving some materials that can contain some Toxic Air Pollutants (TAPs). Emissions of any TAP not listed above shall be limited to less than the MER for that TAP as listed in Table 51.1, 51.2 of LAC 33:III.5112. Additionally, for flexibility purposes, TAP emissions from the facility shall not exceed 8 TPY of a single TAP or 20 TPY of aggregate TAPs.

Port Allen Land LLC
Agency Interest No.: 195964
Port Allen Land LLC
Port Allen, West Baton Rouge Parish, Louisiana

V. PUBLIC NOTICE

Public notice is not required to permit a minor source.

VI. EFFECTS ON AMBIENT AIR

Emissions associated with the proposed facility were reviewed by LDEQ to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

VII. GENERAL CONDITION XVII ACTIVITIES

		Emission Rates - tons				
Work Activity	Schedule	PM_{10}	SO_2	NO_X	CO	VOC
Tank Cleaning	Semi-annually					<5 tpy

VIII. INSIGNIFICANT ACTIVITIES

ID No.:	Description	Citation
None		LAC 33:III.501.B.5

General Information

AI ID: 195964 Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

Also Known As:

ID	Name	User Group	Start Date
3120-00115	CDS #	CDS Number	03-25-2015

Physical Location: 1244 Corn Maize Rd
Port Allen, LA 70767

Mailing Address: 2300 Trowbridge Rd
Albany, GA 31707

Location of Front Gate: 30.490639 latitude, -91.218336 longitude, Coordinate Method: Lat.\Long. - DMS, Coordinate Datum: NAD83

Related People:

Name	Mailing Address	Phone (Type)	Relationship
Mike Yawn	2300 Trowbridge Rd Albany, LA 31707	2293441981 (WP)	Responsible Official for

Related Organizations:

Name	Address	Phone (Type)	Relationship
Port Allen Land LLC	2300 Trowbridge Rd Albany, GA 31707		Owns
Port Allen Land LLC	2300 Trowbridge Rd Albany, GA 31707		Air Billing Party for
Port Allen Land LLC	2300 Trowbridge Rd Albany, GA 31707		Operates

NAIC Codes: 562219, Other Nonhazardous Waste Treatment and Disposal

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Entire Facility-Port Allen Land, LLC						
CON 0001	CSTK-1 - TDU Oxidizer/Desorber Common Stack					8760 hr/yr
CON 0002	1-2015 - TDU Oxidizer Vent		6 MM BTU/hr	5 MM BTU/hr		8760 hr/yr
EQT 0001	1-2015(a) - TDU Desorber Vent					8760 hr/yr
EQT 0002	1-2015 (b) - Oil/Water Separator					8760 hr/yr
EQT 0003	1-2015 (ca) - TK-1					8760 hr/yr
EQT 0004	1-2015 (cb) - TK-2					8760 hr/yr
EQT 0005	1-2015 (cc) - TK-3					8760 hr/yr
EQT 0006	1-2015(cd) - TK-4					8760 hr/yr
EQT 0007	1-2015 (ce) - TK-5					8760 hr/yr
EQT 0008	2-2015 - Desorber Heater		48 MM BTU/hr	40 MM BTU/hr		8760 hr/yr
EQT 0009	4-2015 - Loading Emissions			5 MM gallons/yr	lube oil equivalent	2920 hr/yr
EQT 0010	5-2015 - Baghouse		1952 SCFM	1952 SCFM	Solid fines	8760 hr/yr
EQT 0011	6-2015 - Package Boiler		5 MM BTU/hr	5 MM BTU/hr		8760 hr/yr
FUG 0001	3-2015 - Fugitive Emissions					8760 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Entire Facility-Port Allen Land, LLC							
CON 0001	CSTK-1 - TDU Oxidizer/Desorber Common Stack	1.4	8000	11		40	1500
EQT 0009	4-2015 - Loading Emissions						150
EQT 0010	5-2015 - Baghouse	60	2000	.5		35	70
EQT 0011	6-2015 - Package Boiler	10	900	1.4		30	400

Relationships:

ID	Description	Relationship	ID	Description
CON 0001	CSTK-1 - TDU Oxidizer/Desorber Common Stack	Controls emissions from	EQT 0008	2-2015 - Desorber Heater
CON 0001	CSTK-1 - TDU Oxidizer/Desorber Common Stack	Controls emissions from	CON 0002	1-2015 - TDU Oxidizer Vent
CON 0002	1-2015 - TDU Oxidizer Vent	Controls emissions from	EQT 0001	1-2015(a) - TDU Desorber Vent
CON 0002	1-2015 - TDU Oxidizer Vent	Controls emissions from	EQT 0006	1-2015(cd) - TK-4
CON 0002	1-2015 - TDU Oxidizer Vent	Controls emissions from	EQT 0007	1-2015 (ce) - TK-5
CON 0002	1-2015 - TDU Oxidizer Vent	Controls emissions from	EQT 0002	1-2015 (b) - Oil/Water Separator
CON 0002	1-2015 - TDU Oxidizer Vent	Controls emissions from	EQT 0004	1-2015 (cb) - TK-2
CON 0002	1-2015 - TDU Oxidizer Vent	Controls emissions from	EQT 0003	1-2015 (ca) - TK-1
CON 0002	1-2015 - TDU Oxidizer Vent	Controls emissions from	EQT 0005	1-2015 (cc) - TK-3

INVENTORIES

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

Subject Item Groups:

ID	Group Type	Group Description
UNF 0001	Unit or Facility Wide	PAL LLC - Entire Facility-Port Allen Land, LLC

Group Membership:

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
1722	1722 Small Source Permit		

SIC Codes:

4953	Refuse systems	AI 195964

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

	PM10			PM2.5			SO2			NOx		
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Entire Facility-Port Allen Land, LLC												
CON 0001 CSTK-1	0.335	0.402	1.47	0.335	0.402	1.47	0.026	0.032	0.12	2.206	2.647	9.66
EQT 0009 4-2015												
EQT 0010 5-2015	0.670	0.700	2.93	0.670	0.700	2.93						
EQT 0011 6-2015	0.040	0.040	0.17	0.040	0.040	0.17	0.003	0.003	0.02	0.490	0.490	2.15
FUG 0001 3-2015												

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

	CO			VOC		
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Entire Facility-Port Allen Land, LLC						
CON 0001 CSTK-1	3.706	4.447	16.23	2.123	2.171	9.30
EQT 0009 4-2015				0.035	0.042	0.05
EQT 0010 5-2015						
EQT 0011 6-2015	0.412	0.412	1.80	0.027	0.027	0.12
FUG 0001 3-2015				0.566	0.566	2.48

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CON 0001 CSTK-1	1,2,4-Trichlorobenzene	0.005	0.006	0.02
	Benzene	0.094	0.113	0.41
UNF 0001 PAL LLC	1,2,4,5-Tetrachlorobenzene			0.02
	Benzene			0.41

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

CON 0002 1-2015 - TDU Oxidizer Vent

1 [LAC 33:III.1311.C] Opacity <= 20 percent, except for emissions that have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: Six-minute average

2 [LAC 33:III.501.C.6] Temperature >= 1600 F 870 degrees C) for 0.5 seconds or greater in a thermal incinerator, with a 98 percent or greater VOC destruction or removal efficiency.
Which Months: All Year Statistical Basis: None specified

EQT 0008 2-2015 - Desorber Heater

3 [LAC 33:III.1311.C] Opacity <= 20 percent, except for emissions that have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: Six-minute average

4 [LAC 33:III.1313.C] Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: None specified

EQT 0010 5-2015 - Baghouse

5 [LAC 33:III.501.C.6] Baghouses (including gaskets): Equipment/operational data monitored by technically sound method semiannually or whenever a visible emissions check indicates maintenance may be necessary. Change elements as necessary.
Which Months: All Year Statistical Basis: None specified

6 [LAC 33:III.501.C.6] Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of inspections and maintenance activities on site for a period of at least five years and available for inspection by the Office of Environmental Compliance.

7 [LAC 33:III.501.C.6] Once the baghouse is selected, the particulate matter removal efficiency from the manufacturer's certification shall be included as a modification to the permit.

8 [LAC 33:III.501.C.6] Particulate matter (10 microns or less) (PM10) <= 0.040 gr/dscf.
Which Months: All Year Statistical Basis: None specified

EQT 0011 6-2015 - Package Boiler

9 [LAC 33:III.1311.C] Opacity <= 20 percent, except for emissions that have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: Six-minute average

UNF 0001 PAL LLC - Entire Facility-Port Allen Land, LLC

SPECIFIC REQUIREMENTS

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

UNF 0001 PAL LLC - Entire Facility-Port Allen Land, LLC

10	[LAC 33:III.1103]	Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensifies an existing traffic hazard condition are prohibited.
11	[LAC 33:III.1109.B]	Outdoor burning of waste material or other combustible material is prohibited.
12	[LAC 33:III.1303.B]	Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
13	[LAC 33:III.2113.A]	Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping includes, but is not limited to, the practices listed in LAC 33:III.2113.A.1 through A.5.
14	[LAC 33:III.219]	Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
15	[LAC 33:III.2901.D]	Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
16	[LAC 33:III.2901.F]	If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
17	[LAC 33:III.501.C.6]	Toxic air pollutants (TAP) <= 20 tons/yr for aggregate TAPs. Non-compliance with this limit is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division, if the facility-wide emissions of aggregate TAP s exceed the maximum listed in this specific condition. Which Months: Phases: Statistical Basis: Twelve-month rolling average (rolling 1-month basis)
18	[LAC 33:III.501.C.6]	Use of any material containing a Louisiana Toxic Air Pollutant (TAP) listed in Table 51.1, 51.2, or 51.3 of LAC 33:III.Chapter 51 is permitted. Emissions of any TAP for which this permit lists a facility-wide emission limitation shall be limited to the amount stated. Emissions of any TAP for which this permit does not list a facility-wide emission limitation shall be limited to an amount less than the Minimum Emission Rate (MER) for that TAP as listed in Tables 51.1 and 51.2 of LLAC 33:III.5112. Emissions of any TAP not listed in the Emission Rates for TAP/HAP and Other Pollutants section of this permit in an amount greater than or equal to the MER shall require a permit modification prior to use. Permittee may emit any TAP listed in Table 51.3 of LAC 33:III.5112 at any rate so long as the facility-wide total emission of TAP remains below the amount shown in this specific condition. Non-compliance with this limit is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division, if the facility-wide emissions of TAP exceed the maximum listed in this specific condition for any twelve consectuive month period.
19	[LAC 33:III.537]	Comply with the Louisiana General Conditions as set forth in LAC 33:III.537.
20	[LAC 33:III.5611.A]	Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by DEQ.
21	[LAC 33:III.5611.B]	During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by DEQ to enforce these regulations.

SPECIFIC REQUIREMENTS

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

UNF 0001 PAL LLC - Entire Facility-Port Allen Land, LLC

22	[LAC 33:III.919]	Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 30th of April to the Office of Environmental Services, for the reporting period of the previous calendar year that coincides with period of ownership or operatorship, unless otherwise directed by DEQ. Submit both an emissions inventory and the certification statement required by LAC 33:III.919.F.1.c, separately for each AI, in a format specified by DEQ. Include the information specified in LAC 33:III.919.F.1.a through F.1.d.

Cathy Thompson Wilson

From: Charles Brumfield <charles.brumfield@eaglered.com>
Sent: Monday, May 04, 2015 8:43 AM
To: Cathy Thompson Wilson
Subject: RE: AI 195964 PER20150001

Cathy,
I do not need to review the draft of the permit. Please route for final signature. Thank you.

Charles "Beaux" Brumfield
Sr. Air Project Lead
Eagle Environmental
18369 Petroleum Drive
Baton Rouge, LA 70809
Office: 225.757.0870
Fax: 225.757.8855
Mobile: 225.205.7096
Charles.Brumfield@eaglered.com

From: Cathy Thompson Wilson [mailto:Cathy.Thompson@LA.GOV]
Sent: Monday, April 27, 2015 2:41 PM
To: Charles Brumfield
Subject: RE: AI 195964 PER20150001

I made the changes, but I'll look over everything again tonight and it will go into routing in the morning. Thanks and take care.

From: Charles Brumfield [mailto:charles.brumfield@eaglered.com]
Sent: Monday, April 27, 2015 2:29 PM
To: Cathy Thompson Wilson
Subject: RE: AI 195964 PER20150001

Cathy,
We lost power all morning and just got it back a little while ago. Here are the changes. Let me know if you have any questions.

Charles "Beaux" Brumfield
Sr. Air Project Lead
Eagle Environmental
18369 Petroleum Drive
Baton Rouge, LA 70809
Office: 225.757.0870
Fax: 225.757.8855
Mobile: 225.205.7096

Charles.Brumfield@eaglered.com

From: Cathy Thompson Wilson [mailto:Cathy.Thompson@LA.GOV]
Sent: Monday, April 27, 2015 2:07 PM
To: Charles Brumfield
Subject: AI 195964 PER20150001

Not sure about the weather there, I know a lot of power outages are being reported. Just reminding you to email me the changes we talked about this morning concerning the loading hours and throughput. Take care and thanks.

MAY - 6 2015

AIR PERMIT ROUTING/APPROVAL SLIP-Permits

AI No.	195964	Company	Port Allen Land LLC	Date Received	3/25/2015
Activity No.	PER20150001	Facility	Port Allen Facility	Permit Type	Syngte Minor Mod
CDS No.	3120-00115	Permit No.	3120-00115-00	Expedited Permit	☒ yes ☐ no

1. Technical Review		Approved	Date rec'd	Date FW	Comments
Permit Writer	CEW	CEW	3/26/15	4/28/15	
Air Quality / Modeling					
Toxics					
Technical Advisor		Dgw		4/30/15	
Supervisor		RJT		4/29/15	ok as noted
Other					
2. Management Review (if PN req'd)		**Approved**	**Date rec'd**	**Date FW**	**Comments**
Supervisor					
Manager					
Assistant Secretary (PN)					
3. Response to Comments (if PN req'd)		**Approved**	**Date rec'd**	**Date FW**	**Comments**
Supervisor					
Manager					
Administrator					
Legal (BFD)					
4. Final Approval		**Approved**	**Date rec'd**	**Date FW**	**Comments**
Supervisor					
Manager					
Administrator		CSN		5/4/15	
Assistant Secretary		RJT		5/4/15	

1. Technical Review							
PN of App needed	☐ yes ☒ no	Date of PN of App		Newspaper			
Fee paid	☒ yes ☐ no						
NSPS applies	☐ yes ☒ no	PSD/NNSR applies	☐ yes ☒ no	NESHAP applies	☐ yes ☒ no		

2. Post-Technical Review					
Company technical review	☐ yes ☒ no ☐ n/a	E-mail date		Remarks received	☐ yes ☐ no
Surveillance technical review	☒ yes ☐ no ☐ n/a	E-mail date		Remarks received	☐ yes ☐ no

3. Public Notice					
Public Notice Required	☐ yes ☒ no				
Library					
PN newspaper 1/City	*The Advocate*/Baton Rouge	PN Date		EDMS Verification	☐ yes ☐ no
PN newspaper 2/City		PN Date			☐ yes ☐ no
Company notification letter sent	Date mailed				
EPA PN notification e-mail sent	Date e-mailed				
OES PN mailout	Date				

4. Final Review					
Public comments received	☐ yes ☐ no	EPA comments rec'd	☐ yes ☐ no	Date EPA Resp. to Comments-mailed	
Company comments received	☐ yes ☐ no	PN info entered into Permit Sec VI	☐ yes ☐ no	Date EPA approved permit	
Comments					

BOBBY JINDAL
GOVERNOR

PEGGY M. HATCH
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY

ENVIRONMENTAL SERVICES

Certified Mail No.: 7014 0510 0002 3394 7206

Activity No.: PER20150001
Agency Interest No.: 195964

Mr. Mike Yawn
CEO, Port Allen Land LLC
2300 Trowbridge Rd
Albany, GA 31707

RE: Permit, Port Allen Land LLC, Port Allen Facility
Port Allen, West Baton Rouge Parish, Louisiana

Dear Mr. Yawn:

This is to inform you that the permit request for the above referenced facility has been approved under LAC 33:III.501. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets, and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Also enclosed is a document entitled "General Information." Please be advised that this document contains a summary of facility-level information contained in LDEQ's TEMPO database and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may email your changes to facupdate@la.gov.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight, ten years from the issue date below, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

The permit number cited below and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this 4 day of May, 2015.

Permit No.: 3120-00115-00

Sincerely,

Tegan B. Treadaway

Tegan B. Treadaway
Assistant Secretary
TBT:cew

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Port Allen Land LLC
Agency Interest No.: 195964
Port Allen Land LLC
Port Allen, West Baton Rouge Parish, Louisiana

I. BACKGROUND

Port Allen Land LLC (PAL), Port Allen Facility, is proposing to build and operate an indirect fired Thermal Desorption Unit (TDU), which will be located on the west bank of the Mississippi River in Port Allen, West Baton Rouge Parish, Louisiana. The facility will process non- hazardous materials to recover and recycle valuable materials. These materials can include oil-bearing secondary wastes, sludges, and other oilfield and refinery materials.

II. ORIGIN

A permit application and Emissions Inventory Questionnaire (EIQ) dated March 25, 2015, were received requesting a permit. Additional information dated April 7, 21 and 27, 2015, was also received.

III. DESCRIPTION

Port Allen Land, LLC (PAL), is proposing to build and operate an indirect fired Thermal Desorption Unit (TDU), which will process a variety of petroleum and oil-bearing materials to recover and recycle useful hydrocarbon materials that would otherwise be disposed of in a landfill.

The petroleum materials will be fed to an indirect-fired, natural gas fueled TDU where the hydrocarbons will be liberated from the substrate materials by raising them beyond their boiling points to about 900 degrees Fahrenheit. Heavier materials such as any metals and inert materials will drop out of the dryer in solid form. The vent stream carrying the hydrocarbons will pass through a series of recovery equipment including a cyclone, hydroclone, and a venturi scrubber. Any remaining constituents of the vent stream will be processed through an acid gas scrubber and a thermal oxidizer. The clean effluent gas from the oxidizer will be routed back to the shell of the dryer for increased thermal efficiency. Water from the scrubber will be routed through the water treatment system where additional material recovery will occur. The materials recovered will include clean solid substrates and liquid hydrocarbons.

The thermal oxidizer will control the emissions from the desorber vent, oil water separator, and the storage tanks at the facility and is designed to operate with a better than 99.9% destruction efficiency, but for conservative reasons, the efficiency will be set at 99%. Emissions of residual hydrocarbons will be very small.

The majority of the hydrocarbons that are present in the feed materials will be recovered in the process. The small amounts of lighter hydrocarbons that cannot be recovered are controlled in

the thermal oxidizer. Additionally, there is a vent stream containing recovered hydrocarbons that is routed to the recovery equipment and then to the control equipment. After passing through the oxidizer, this hot vent stream will be passed through the shell of the desorber to increase desorber energy efficiency.

The process water will be sent through an oil separator to recover additional hydrocarbon materials. These materials will be added to the recovered oil for re-sale.

Recovered hydrocarbons and in-process waste water will be stored in tanks. The hydrocarbons will be sold offsite and the water will be treated and returned to the process.

The TDU will operate at 40 MMBTU per hour. The triple shell indirect-fired rotary desorber will heat the materials being fed without direct contact. The desorber is fired by natural gas.

Recovered hydrocarbons will be equivalent to lube oil in physical characteristics. This material will be loaded into tank trucks periodically for sale to other users.

The baghouse controls any particulate emissions that originate from the solids cooling and controlling auger. It will be used to remove the majority of any particulates that are generated during the solids recovery process.

A package boiler will be utilized to generate steam for use in heating the heavier sludge materials to increase the ability to move these through the process.

Non-specified area sources can generate fugitive emissions from equipment that is in potential VOC service. These emissions are very small. Other emissions are from insignificant activities.

There are no other facilities owned by PAL and contiguous with the TDU facility.

Port Allen Land LLC
Agency Interest No.: 195964
Port Allen Land LLC
Port Allen, West Baton Rouge Parish, Louisiana

Estimated emissions from this facility in tons per year are as follows:

Pollutant	Emissions (TPY)
PM_{10}	4.57
$PM_{2.5}$	4.57
SO_2	0.14
NO_X	11.81
CO	18.03
VOC	12.25

LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs)*:

Pollutant	Emissions (TPY)
Benzene	0.41
1,2,4-Trichlorobenzene	0.02
Total	*

IV. TYPE OF REVIEW

This permit was reviewed for compliance with Louisiana Air Quality Regulations. New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD)/Non-attainment New Source Review (NNSR) do not apply.

*This proposed facility will be a minor source of LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs). The Port Allen Facility is being permitted to service a wide variety of non-hazardous materials that can contain very different chemical components. The facility will be receiving some materials that can contain some Toxic Air Pollutants (TAPs). Emissions of any TAP not listed above shall be limited to less than the MER for that TAP as listed in Table 51.1, 51.2 of LAC 33:III.5112. Additionally, for flexibility purposes, TAP emissions from the facility shall not exceed 8 TPY of a single TAP or 20 TPY of aggregate TAPs.

Port Allen Land LLC
Agency Interest No.: 195964
Port Allen Land LLC
Port Allen, West Baton Rouge Parish, Louisiana

V. PUBLIC NOTICE

Public notice is not required to permit a minor source.

VI. EFFECTS ON AMBIENT AIR

Emissions associated with the proposed facility were reviewed by LDEQ to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

VII. GENERAL CONDITION XVII ACTIVITIES

		Emission Rates - tons				
Work Activity	Schedule	PM_{10}	SO_2	NO_X	CO	VOC
Tank Cleaning	Semi-annually					<5 tpy

VIII. INSIGNIFICANT ACTIVITIES

ID No.:	Description	Citation
None		LAC 33:III.501.B.5

General Information

AI ID: 195964 Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

Also Known As:

ID	Name	User Group	Start Date
3120-00115	CDS #	CDS Number	03-25-2015

Physical Location: 1244 Corn Maize Rd
Port Allen, LA 70767

Mailing Address: 2300 Trowbridge Rd
Albany, GA 31707

Location of Front Gate: 30.490639 latitude, -91.218336 longitude, Coordinate Method: Lat.\Long. - DMS, Coordinate Datum: NAD83

Related People:

Name	Mailing Address	Phone (Type)	Relationship
Mike Yawn	2300 Trowbridge Rd Albany, LA 31707	2293441981 (WP)	Responsible Official for

Related Organizations:

Name	Address	Phone (Type)	Relationship
Port Allen Land LLC	2300 Trowbridge Rd Albany, GA 31707		Owns
Port Allen Land LLC	2300 Trowbridge Rd Albany, GA 31707		Air Billing Party for
Port Allen Land LLC	2300 Trowbridge Rd Albany, GA 31707		Operates

NAIC Codes: 562219, Other Nonhazardous Waste Treatment and Disposal

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Entire Facility-Port Allen Land, LLC						
CON 0001	CSTK-1 - TDU Oxidizer/Desorber Common Stack					8760 hr/yr
CON 0002	1-2015 - TDU Oxidizer Vent		6 MM BTU/hr	5 MM BTU/hr		8760 hr/yr
EQT 0001	1-2015(a) - TDU Desorber Vent					8760 hr/yr
EQT 0002	1-2015 (b) - Oil/Water Separator					8760 hr/yr
EQT 0003	1-2015 (ca) - TK-1					8760 hr/yr
EQT 0004	1-2015 (cb) - TK-2					8760 hr/yr
EQT 0005	1-2015 (cc) - TK-3					8760 hr/yr
EQT 0006	1-2015(cd) - TK-4					8760 hr/yr
EQT 0007	1-2015 (ce) - TK-5					8760 hr/yr
EQT 0008	2-2015 - Desorber Heater		48 MM BTU/hr	40 MM BTU/hr		8760 hr/yr
EQT 0009	4-2015 - Loading Emissions			5 MM gallons/yr	lube oil equivalent	2920 hr/yr
EQT 0010	5-2015 - Baghouse		1952 SCFM	1952 SCFM	Solid fines	8760 hr/yr
EQT 0011	6-2015 - Package Boiler		5 MM BTU/hr	5 MM BTU/hr		8760 hr/yr
FUG 0001	3-2015 - Fugitive Emissions					8760 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Entire Facility-Port Allen Land, LLC							
CON 0001	CSTK-1 - TDU Oxidizer/Desorber Common Stack	1.4	8000	11		40	1500
EQT 0009	4-2015 - Loading Emissions						150
EQT 0010	5-2015 - Baghouse	60	2000	.5		35	70
EQT 0011	6-2015 - Package Boiler	10	900	1.4		30	400

Relationships:

ID	Description	Relationship	ID	Description
CON 0001	CSTK-1 - TDU Oxidizer/Desorber Common Stack	Controls emissions from	EQT 0008	2-2015 - Desorber Heater
CON 0001	CSTK-1 - TDU Oxidizer/Desorber Common Stack	Controls emissions from	CON 0002	1-2015 - TDU Oxidizer Vent
CON 0002	1-2015 - TDU Oxidizer Vent	Controls emissions from	EQT 0001	1-2015(a) - TDU Desorber Vent
CON 0002	1-2015 - TDU Oxidizer Vent	Controls emissions from	EQT 0006	1-2015(cd) - TK-4
CON 0002	1-2015 - TDU Oxidizer Vent	Controls emissions from	EQT 0007	1-2015 (ce) - TK-5
CON 0002	1-2015 - TDU Oxidizer Vent	Controls emissions from	EQT 0002	1-2015 (b) - Oil/Water Separator
CON 0002	1-2015 - TDU Oxidizer Vent	Controls emissions from	EQT 0004	1-2015 (cb) - TK-2
CON 0002	1-2015 - TDU Oxidizer Vent	Controls emissions from	EQT 0003	1-2015 (ca) - TK-1
CON 0002	1-2015 - TDU Oxidizer Vent	Controls emissions from	EQT 0005	1-2015 (cc) - TK-3

INVENTORIES

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

Subject Item Groups:

ID	Group Type	Group Description
UNF 0001	Unit or Facility Wide	PAL LLC - Entire Facility-Port Allen Land, LLC

Group Membership:

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
1722	1722 Small Source Permit		

SIC Codes:

4953	Refuse systems	AI 195964

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

	PM10			PM2.5			SO2			NOx		
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Entire Facility-Port Allen Land, LLC												
CON 0001 CSTK-1	0.335	0.402	1.47	0.335	0.402	1.47	0.026	0.032	0.12	2.206	2.647	9.66
EQT 0009 4-2015												
EQT 0010 5-2015	0.670	0.700	2.93	0.670	0.700	2.93						
EQT 0011 6-2015	0.040	0.040	0.17	0.040	0.040	0.17	0.003	0.003	0.02	0.490	0.490	2.15
FUG 0001 3-2015												

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

	CO			VOC		
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Entire Facility-Port Allen Land, LLC						
CON 0001 CSTK-1	3.706	4.447	16.23	2.123	2.171	9.30
EQT 0009 4-2015				0.035	0.042	0.05
EQT 0010 5-2015						
EQT 0011 6-2015	0.412	0.412	1.80	0.027	0.027	0.12
FUG 0001 3-2015				0.566	0.566	2.48

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CON 0001 CSTK-1	1,2,4-Trichlorobenzene	0.005	0.006	0.02
	Benzene	0.094	0.113	0.41
UNF 0001 PAL LLC	1,2,4,5-Tetrachlorobenzene			0.02
	Benzene			0.41

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

CON 0002 1-2015 - TDU Oxidizer Vent

1	[LAC 33:III.1311.C]	Opacity <= 20 percent, except for emissions that have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. (Complies by using sweet natural gas as fuel). Which Months: All Year Statistical Basis: Six-minute average
2	[LAC 33:III.501.C.6]	Temperature >= 1600 F 870 degrees C) for 0.5 seconds or greater in a thermal incinerator, with a 98 percent or greater VOC destruction or removal efficiency. Which Months: All Year Statistical Basis: None specified

EQT 0008 2-2015 - Desorber Heater

3	[LAC 33:III.1311.C]	Opacity <= 20 percent, except for emissions that have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. (Complies by using sweet natural gas as fuel). Which Months: All Year Statistical Basis: Six-minute average
4	[LAC 33:III.1313.C]	Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel). Which Months: All Year Statistical Basis: None specified

EQT 0010 5-2015 - Baghouse

5	[LAC 33:III.501.C.6]	Baghouses (including gaskets): Equipment/operational data monitored by technically sound method semiannually or whenever a visible emissions check indicates maintenance may be necessary. Change elements as necessary. Which Months: All Year Statistical Basis: None specified
6	[LAC 33:III.501.C.6]	Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of inspections and maintenance activities on site for a period of at least five years and available for inspection by the Office of Environmental Compliance.
7	[LAC 33:III.501.C.6]	Once the baghouse is selected, the particulate matter removal efficiency from the manufacturer's certification shall be included as a modification to the permit.
8	[LAC 33:III.501.C.6]	Particulate matter (10 microns or less) (PM10) <= 0.040 gr/dscf. Which Months: All Year Statistical Basis: None specified

EQT 0011 6-2015 - Package Boiler

9	[LAC 33:III.1311.C]	Opacity <= 20 percent, except for emissions that have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. (Complies by using sweet natural gas as fuel). Which Months: All Year Statistical Basis: Six-minute average

UNF 0001 PAL LLC - Entire Facility-Port Allen Land, LLC

SPECIFIC REQUIREMENTS

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

UNF 0001 PAL LLC - Entire Facility-Port Allen Land, LLC

10	[LAC 33:III.1103]	Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensifies an existing traffic hazard condition are prohibited.
11	[LAC 33:III.1109.B]	Outdoor burning of waste material or other combustible material is prohibited.
12	[LAC 33:III.1303.B]	Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
13	[LAC 33:III.2113.A]	Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping includes, but is not limited to, the practices listed in LAC 33:III.2113.A.1 through A.5.
14	[LAC 33:III.219]	Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
15	[LAC 33:III.2901.D]	Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
16	[LAC 33:III.2901.F]	If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
17	[LAC 33:III.501.C.6]	Toxic air pollutants (TAP) <= 20 tons/yr for aggregate TAPs. Non-compliance with this limit is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division, if the facility-wide emissions of aggregate TAP s exceed the maximum listed in this specific condition. Which Months: Phases: Statistical Basis: Twelve-month rolling average (rolling 1-month basis)
18	[LAC 33:III.501.C.6]	Use of any material containing a Louisiana Toxic Air Pollutant (TAP) listed in Table 51.1, 51.2, or 51.3 of LAC 33:III.Chapter 51 is permitted. Emissions of any TAP for which this permit lists a facility-wide emission limitation shall be limited to the amount stated. Emissions of any TAP for which this permit does not list a facility-wide emission limitation shall be limited to an amount less than the Minimum Emission Rate (MER) for that TAP as listed in Tables 51.1 and 51.2 of LLAC 33:III.5112. Emissions of any TAP not listed in the Emission Rates for TAP/HAP and Other Pollutants section of this permit in an amount greater than or equal to the MER shall require a permit modification prior to use. Permittee may emit any TAP listed in Table 51.3 of LAC 33:III.5112 at any rate so long as the facility-wide total emission of TAP remains below the amount shown in this specific condition. Non-compliance with this limit is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division, if the facility-wide emissions of TAP exceed the maximum listed in this specific condition for any twelve consectuive month period.
19	[LAC 33:III.537]	Comply with the Louisiana General Conditions as set forth in LAC 33:III.537.
20	[LAC 33:III.5611.A]	Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by DEQ.
21	[LAC 33:III.5611.B]	During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by DEQ to enforce these regulations.

SPECIFIC REQUIREMENTS

AI ID: 195964 - Port Allen Land LLC
Activity Number: PER20150001
Permit Number: 3120-00115-00
Air - Minor Source/Small Source Initial

UNF 0001 PAL LLC - Entire Facility-Port Allen Land, LLC

22	[LAC 33:III.919]	Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 30th of April to the Office of Environmental Services, for the reporting period of the previous calendar year that coincides with period of ownership or operatorship, unless otherwise directed by DEQ. Submit both an emissions inventory and the certification statement required by LAC 33:III.919.F.1.c, separately for each AI, in a format specified by DEQ. Include the information specified in LAC 33:III.919.F.1.a through F.1.d.

Cathy Thompson Wilson

From: Charles Brumfield <charles.brumfield@eaglered.com>
Sent: Monday, May 04, 2015 8:43 AM
To: Cathy Thompson Wilson
Subject: RE: AI 195964 PER20150001

Cathy,
I do not need to review the draft of the permit. Please route for final signature. Thank you.

Charles "Beaux" Brumfield
Sr. Air Project Lead
Eagle Environmental
18369 Petroleum Drive
Baton Rouge, LA 70809
Office: 225.757.0870
Fax: 225.757.8855
Mobile: 225.205.7096
Charles.Brumfield@eaglered.com

From: Cathy Thompson Wilson [mailto:Cathy.Thompson@LA.GOV]
Sent: Monday, April 27, 2015 2:41 PM
To: Charles Brumfield
Subject: RE: AI 195964 PER20150001

I made the changes, but I'll look over everything again tonight and it will go into routing in the morning. Thanks and take care.

From: Charles Brumfield [mailto:charles.brumfield@eaglered.com]
Sent: Monday, April 27, 2015 2:29 PM
To: Cathy Thompson Wilson
Subject: RE: AI 195964 PER20150001

Cathy,
We lost power all morning and just got it back a little while ago. Here are the changes. Let me know if you have any questions.

Charles "Beaux" Brumfield
Sr. Air Project Lead
Eagle Environmental
18369 Petroleum Drive
Baton Rouge, LA 70809
Office: 225.757.0870
Fax: 225.757.8855
Mobile: 225.205.7096